

Environmental Audit Committee

Environmental sustainability and housing growth

Sixth Report of Session 2024–26

HC 439

Environmental Audit Committee

The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by His Majesty's Ministers; and to report thereon to the House.

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Glossary

Biodiversity Net Gain (BNG) provisions require that habitats for wildlife are left in a measurably better state than they were before development. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10% (i.e. biodiversity is 10% better after a development compared to before).

Department for Environment, Food and Rural Affairs (DEFRA) is the government department responsible for improving and protecting the environment. It aims to grow a green economy and sustain thriving rural communities.

Embodied Carbon refers to the total greenhouse gas emissions associated with the construction of a building, such as the transportation and installation of building materials, making its control a critical factor in addressing climate change. (see also Operational Carbon).

Environmental Development Plans (EDPs) are proposed in Part Three of the Government's Planning and Infrastructure Bill (see below), which is currently being considered by Parliament. They consist of a package of conservation measures that aim to offset and address the environmental impacts of development. Unlike current approaches, that assess impacts on a site-by-site basis, EDPs apply to broader geographical areas, aiming to enable more strategic environmental planning.

Environmental Land Management Schemes (ELMS) are a government initiative that aims to support sustainable food production while enhancing the natural environment. These schemes include the *Sustainable Farming Incentive*, which pays farmers to adopt and maintain sustainable farming practices that can protect and enhance the natural environment alongside food production; *Countryside Stewardship* which pays for more targeted actions relating to specific locations, features and habitats; and *Landscape Recovery* which pays for bespoke, longer-term, larger scale projects to enhance the natural environment.

Environmental Principles Policy Statement (EPPS) are five principles set out in the Environment Act 2021 and effective in law since November 2023. They are:

- *Integration:* The principle that environmental protection should be integrated into the policy making.
- *Prevention:* Government policy should aim to prevent environmental harm.
- *Rectification at Source:* Environmental damage should be addressed at its source, thereby avoiding the need to remedy the impacts later.
- *Polluter Pays:* Where possible, the cost of pollution should be borne by those causing it, rather than those who are impacted by the effects of environmental damage.
- *Precautionary Principle:* Where there are threats of serious or irreversible environmental damage, a lack of full scientific certainty will not be used as a reason to postpone cost-effective measures to prevent environmental degradation.

Local Planning Authorities (LPAs) in England play a crucial role in the planning system, overseeing and managing the planning system within a specific geographical area. Their responsibilities include preparing local plans, determining planning applications, and enforcing regulations against unauthorised development.

Local Nature Recovery Strategies (LNRS) seek to set priorities for nature recovery at a local level in England and are a statutory requirement under the Environment Act 2021. They aim to identify actions and locations where focused, evidence-based and properly resourced activity should be prioritised to drive the recovery of nature. Each strategy is tailored to its area, with a focus on enhancing, creating, and expanding important habitats and species. The LNRSs are designed to inform the planning process locally and provide landowners with options for what they could do on their land.

Ministry of Housing, Communities and Local Government (MHCLG) is a government department responsible for housing, communities, and local government in England, including planning. Its key functions include overseeing housing policy, community development, and local government operations.

Mitigation Hierarchy (MH) seeks to minimise the impacts a development has on biodiversity. The mitigation hierarchy has four levels that should be applied in order of priority:

- 1) Avoidance:** Preventing or reducing negative impacts on biodiversity.
- 2) Minimisation:** Reducing the severity or extent of impacts that cannot be avoided.

3) Restoration: Restoring degraded biodiversity or enhancing existing biodiversity.

4) Offsetting: Creating new biodiversity or improving the condition of biodiversity elsewhere; this should be used as a last resort.

National Planning Policy Framework (NPPF) outlines the Government's planning policies for England, focusing on sustainable development, housing delivery, and local planning. It was first published in March 2012 and has been revised several times since, most recently in December 2024.

Natural England (NE) is an executive non-departmental public body, sponsored by DEFRA. It plays a leading role in protecting and enhancing England's natural environment, including its land, flora and fauna, freshwater and marine environments, geology and soils. Its powers include awarding grants, designating Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest, managing national nature reserves, overseeing access to open country, and enforcing the associated regulations.

Nature Restoration Fund (NRF) is proposed in Part Three of the Government's Planning and Infrastructure Bill (see below). It is designed to support environmental conservation efforts in England, through strategic nature restoration projects. Developers pay into a NRF with the aim of offsetting the environmental impacts of their projects. This is a new approach for developers to meet their environmental obligations, allowing them to make payments into the fund instead of directly mitigating impacts on-site. NRF funds are used to deliver measures outlined in EDPs.

Nature Recovery Network (NRN) is a national network of wildlife-rich places, supported by green and blue spaces that buffer and connect them. They include action to:

- Enhance sites designated for nature conservation and other wildlife-rich areas.
- Create and restore habitats to help wildlife populations recover, grow, and adapt to climate change.
- Improve the natural and urban environment's resilience to climate change, using nature-based solutions to reduce carbon emissions and manage flood risk.
- Sustain vital ecosystems that provide healthy soil, clean water and clean air.
- Protect the natural, geological, historical and cultural diversity of the natural environment.

- Provide more, better green spaces to improve health and wellbeing.

Nutrient Neutrality (NN) is achieved when additional nutrients introduced into a waterway are balanced by measures to prevent an overall increase in nutrient levels. Housing developments are a common source of excess nutrients, often through sewage and wastewater. These nutrients typically include compounds such as nitrogen and phosphorous, which can trigger excessive algal growth. This can deplete levels of oxygen in the water, kill aquatic life and degrade ecosystems. The nutrient neutrality policy requires that all housing developments, in designated areas, must not increase nutrient pollution in nearby water catchments.

The Office for Environmental Protection (The OEP) is an independent public body that holds the Government and other public authorities to account on environmental matters. Its powers and duties include monitoring and assessing the implementation of environmental law, providing advice to government on environmental law and policy, and enforcing compliance with environmental legal obligations.

Operational Carbon is the carbon emitted through the day-to-day use of a building–this can include heating, cooling, ventilation, or the running of key infrastructure such as lifts, and the powering of electronics and appliances.

Planning and Infrastructure Bill (PIB) is currently being considered by Parliament. It aims to reform the planning system in England and streamline the delivery of new homes and critical infrastructure. The Bill's scope extends beyond housing, addressing matters such as transport infrastructure and improvements to the Nationally Significant Infrastructure Projects (NSIP) regime, to enhance project efficiency. It will also introduce the Nature Restoration Fund and Environmental Delivery Plans (see above), which aim to help housing developers meet their environmental obligations while achieving property delivery targets.

Whole Life Carbon Assessment (WLCA) is a methodology used to measure the total carbon emissions associated with a building throughout its entire life cycle. It is used to manage carbon budgets and reduce lifecycle emissions.

Summary

The Government aims to build 1.5 million new homes this Parliament. This report sets out a comprehensive analysis of how the Government can meet this ambition, whilst achieving the targets that commit it to improving the natural environment and reversing nature's decline.

This report challenges the lazy narrative that nature is a blocker to housing delivery, instead arguing that a healthy environment is not a luxury but a necessity for resilient towns and neighbourhoods.

We raise concerns about whether the Government's Planning and Infrastructure Bill, and other environmental planning policies, are sufficient to achieve the Government's legally binding targets to halt and reverse the decline of nature by 2042.

The report also explores the role of the built environment, the carbon impact of building 1.5 million homes, and the central role retrofitting and embodied carbon assessments can play in meeting the Government's housing and emission reduction targets.

Crucially, the report identifies several key blockers in the system: A lack of cross-government policy alignment and co-ordination, fragmented data systems, and a dearth of ecological, planning and construction skills. These are major obstacles for the Government while it is striving to deliver the twin aims of housing growth and nature recovery.

We believe that the Government can achieve the house building target and meet its environmental, nature and climate change targets, if it addresses the issues we identify and gives serious consideration to our recommended solutions.

1 Introduction

1. Delivering new housing while restoring nature and tackling climate change is a complex policy balancing act. Demand for housing in England continues to rise as life expectancy increases, lifestyles change, and the population grows.¹ The repercussions of insufficient housing are severe, with over 700,000 homes classed as overcrowded, 1.3 million households on social housing waiting lists, and 160,000 children living in temporary accommodation.²
2. At the same time, urbanisation continues to be a major driver of biodiversity loss and habitat fragmentation. The UK is known to be one of the most nature-depleted countries in the world, with almost 1,500 species at risk of extinction.³ The intrinsic value of nature, alongside the social, cultural, physical and mental health benefits are well-recognised. In terms of overall economic benefits, the Office for National Statistics calculates that the total asset value of the UK's ecosystem services is £1.8 trillion - equivalent to 72% of GDP.⁴
3. The UK has a duty to halt and reverse biodiversity loss by 2030, as a signatory to the Kunming-Montreal Global Biodiversity Framework.⁵ In addition, the Government has an obligation to comply with the biodiversity targets laid out in the Environment Act 2021 and meet the emissions reduction targets laid out in the Climate Change Act 2008 and the Paris Agreement.⁶

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- 1 Homes England, [Fact Sheet 1: The Need for Homes](#), 16 January 2024, [withdrawn].
 - 2 Ministry of Housing, Communities and Local Government, [Planning Overhaul to Reach 1.5 Million new Homes](#), 12 December 2024; Homes England, [Fact Sheet 1: The Need for Homes](#), accessed 20 October 2025.
 - 3 Environment Agency, [The State of the Environment: The Urban Environment](#), 26 January 2023; [State of Nature 2023](#), accessed 20 October 2025.
 - 4 Office for National Statistics, [UK Natural Capital Accounts: 2024](#), 8 November 2024, (based on 2022 figures); Environmental Audit Committee, First Report of Session 2024–25, [The Role of Natural Capital in the UK's Green Economy](#), HC 501, p.3, para. 2.
 - 5 Department for Environment, Food and Rural Affairs, [UK Among First Countries to Back New Nature Recovery Fund](#), 25 August 2023; Department for Agriculture, Environment and Rural Affairs, Scottish Government, Welsh Government and UK Government, [Blueprint for Halting and Reversing Biodiversity Loss: The UK's National Biodiversity Strategy and Action Plan for 2030](#), April 2025.
 - 6 House of Commons Library, [Planning and Infrastructure Bill 2024–25](#), CBP 10216, 21 March 2025, p.66; Department for Energy Security and Net Zero, [UK's 2035 Nationally Determined Contribution \(NDC\) Emissions Reduction Target Under the Paris Agreement](#), 30 January 2025.

4. In December 2024, the Government announced it would build 1.5 million homes this Parliament, delivering 370,000 homes each year.⁷ Alongside this announcement, the Government committed to implementing a series of reforms to planning and nature regulation. This has taken the form of the Planning and Infrastructure Bill, currently nearing the end of its legislative process, a revision of the National Planning Policy Framework and a promise to build three new towns.⁸
5. The passage of the Planning and Infrastructure Bill has been controversial, with substantial concerns around the weakening of environmental safeguards resulting in substantial changes to the Bill during its progress through Parliament. Government rhetoric has framed the environment as a ‘blocker’ to development, a narrative which distracts from more systemic barriers to housing delivery and has been refuted on multiple occasions.⁹
6. There is no doubt that balancing nature restoration, emission reduction targets, and house building is an intricate challenge with big implications for where and how people live. All can be achieved simultaneously, with careful forethought and thorough planning. Yet the Government’s approach thus far has appeared to be rushed and reactive. We launched this inquiry to explore how these objectives can best be pursued in complementary, rather than conflicting, terms.

Our Inquiry

7. This inquiry was our first to be launched in this Parliament, on 18 November 2024.¹⁰ It was initiated prior to an evidence session held on the Government’s reform of the National Planning Policy Framework on 20 November 2024, which explored many of the issues which the inquiry subsequently focused on.¹¹

7 Ministry of Housing, Communities and Local Government, [Planning Overhaul to Reach 1.5 Million New Homes](#), 12 December 2024.

8 UK Parliament, [Planning and Infrastructure Bill - Parliamentary Bills](#), (accessed 20 October 2025); Ministry of Housing, Communities and Local Government, [Expert Taskforce Recommends Locations for New Towns](#), 28 September 2025.

9 Q35; Ministry of Housing, Communities and Local Government, [Planning Proposals Get Britain Building and Turn the Tide on Nature’s Decline](#), 15 December 2024; The Guardian, [UK Government Admits Almost No Evidence Nature Protections Block Development](#), 7 May 2025; Planning Resource, [‘Natural England Chair Rejects Ministers’ Claim That Nature Blocks Development’](#), June 2025, (behind paywall); Planning Resource, [Chancellor Reportedly Told Event that She Intervened to ‘Unblock’ 20,000 Homes Held Up By ‘Some Snails’ After Being Alerted By Developer](#), 7 October 2025, (behind paywall).

10 Environmental Audit Committee, [Can Building 1.5 Million Homes Support UK Nature and Climate Goals? EAC Launches Inquiry as it Holds First Evidence Session of the New Parliament](#), 18 November 2024.

11 Environmental Audit Committee, [National Planning Policy Framework Reforms and the Environment](#), HC 458, 20 November 2024.

8. This Committee has a range of views on housing expansion and its impact on net zero and biodiversity, which is considered in our report. This inquiry examined whether the Government can deliver its housebuilding targets and meet the environmental goals that it has signed up for, regardless of our views on what those goals might be. This is fully in keeping with our remit to “consider the extent to which the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development, and to audit their performance against sustainable development and environmental protection targets”.¹²
9. This report considers a range of government planning and nature policies, including the reforms proposed under Part Three of the Planning and Infrastructure Bill. We explore additional environmental planning policies, such as the changes made to the National Planning Policy Framework and the progress of Biodiversity Net Gain. This report does not explore the environmental impact of new towns.¹³
10. Beyond biodiversity, the report assesses the emissions impact of building 1.5 million homes and how cross-government co-operation can be improved to speed up housing delivery. In addition, it highlights how severe shortages in skills and expertise will undermine any progress made towards nature recovery and housing delivery, regardless of any legislation passed.
11. We received 104 written responses to our call for evidence, and held six public evidence sessions, hearing from 29 witnesses across 10 panels.^{14 15} This is in addition to two panels we held on the National Planning Policy Framework, including six further witnesses. We heard from a wide range of experts and stakeholders, including planning professionals, ecologists, developers, estate managers, academics and researchers – as well as the Chief Executives of the Environment Agency, Natural England, and Homes England. Senior officials from the Department for Environment, Food and Rural Affairs and the Ministry of Housing, Communities and Local

12 [Environmental Audit Committee](#).

13 Prime Minister’s Office, 10 Downing Street, Ministry of Housing, Communities and Local Government and The Rt Hon Sir Keir Starmer KCB KC MP, [Government unveils plans for next generation of new towns](#), (13 February 2025). See also: Ministry of Housing, Communities and Local Government, [New Towns Taskforce: Report to Government](#), (September 2025). The UK government, through the New Towns Taskforce, has identified 12 potential locations for new towns. The House of Lords Built Environment Committee published a report on 25 October on the Government’s new towns programme: [New Towns: Laying the Foundations](#), (HL 183).

14 Environmental Audit Committee, [Written Evidence: Environmental Sustainability and Housing Growth](#), accessed 7 October 2025.

15 Environmental Audit Committee, [Oral Evidence Sessions: Environmental Sustainability and Housing Growth](#), accessed 7 October 2025.

Government also gave evidence, alongside the Minister for Nature, Mary Creagh MP, and the Minister for Housing and Planning, Matthew Pennycook MP.

12. As part of the inquiry, we visited the Netherlands and the Duchy of Cornwall's Nansledan estate, to understand different approaches to sustainable housing and nature restoration. We also held an engagement event with young adults, between the ages of 15 and 18, to understand the priorities of younger generations in relation to housing, the environment and climate change.
13. We are grateful to everyone who submitted written evidence, gave oral evidence, or otherwise supported this inquiry. We also thank those who facilitated and hosted our visits, as well as those who attended and supported our public engagement event.

2 Policy and Governance

14. This chapter examines key elements of England’s environmental and planning policy landscape, exploring how key principles are defined, applied and align. It explores the extent to which the Government is adhering to key environmental obligations, and how effectively spatial data is shared cross-government. It examines how environmental responsibilities—such as those in the revised National Planning Policy Framework (NPPF) and the upcoming Nature Restoration Fund—are interpreted and managed, and how they may shape the execution of environmental obligations in the planning and development process. Finally, the chapter looks at how a range of spatial and environmental policies interact and align with each other, assessing the extent to which they can coherently deliver nature and climate-positive planning and housing delivery.

2.1 Legislation

15. The Environment Act 2021 (EA 2021) is a key piece of legislation that established a legal framework for environmental protection and improvement in England.¹⁶ The EA 2021 consists of legally binding targets to halt and reverse biodiversity loss by 2030 and 2042, respectively.¹⁷
16. Section 17(5) of the Act introduced a requirement on the Secretary of State for Environment, Food and Rural Affairs to prepare an Environmental Principles Policy Statement (EPPS) explaining how five environmental principles should be interpreted and proportionately applied by Ministers when making policy.¹⁸ The Principles comprise: Integration; Prevention; Precautionary; Rectification at Source; and Polluter Pays.^{19 20}

16 Prime Minister’s Office, [Queen’s Speech Background Briefing Notes](#), December 2019, p.112; [Environment Act 2021](#); Department for Environment, Food and Rural Affairs, [World-Leading Environment Act Becomes Law](#), 10 November 2021.

17 Department for Environment, Food and Rural Affairs and Natural England, [Delivering on the Environment Act: New Targets Announced and Ambitious Plans for Nature Recovery](#), 16 March 2022.

18 [Environment Act 2021](#).

19 Department for Environment, Food and Rural Affairs, [Environmental Principles Policy Statement](#), Under the subtitles: ‘What are environmental principles’ and ‘The precautionary principle’, 31 January 2023.

20 House of Lords Library, [Draft Environmental Principles Policy Statement](#), 24 June 2022.

17. Section 19 of the EA 2021 requires a Minister to have “due regard to the policy statement on environmental principles currently in effect” when making policy.²¹ In addition, a Minister is not required to take or avoid any action if it “would have no significant environmental benefit, or would be in any other way disproportionate to the environmental benefit”.²²
18. The previous Government, which introduced the Environmental Principles, said they were “internationally recognised as successful benchmarks for environmental protection and enhancement”.²³ Indeed, in 2023, Dame Glenys Stacey, Chair of the Office for Environmental Protection (OEP), stated that, if properly applied, the EPPS could be a “powerful tool” to help the Government achieve its aim of leaving the environment in a better state than it found it.²⁴ The OEP has described the EPPS as a key mechanism through which the Government can improve the environment.²⁵ In the OEP’s 2024 review of the EPPS, it suggested that the Government should publicly report on the implementation of the policy statement.²⁶ The current Government has maintained that, although it is committed to transparency and that the EPPS is central to government policy, “there is no statutory requirement for policy-specific information relating to the application of the EPPS duty to be published”.²⁷
19. Evidence from the Town and Country Planning Association argued that no assessment of the revised National Planning Policy Framework (NPPF) (see section 2.3) had been completed in accordance with section 19 of the EA 2021. They concluded that either the provisions of the Act are ineffective or are not being properly considered in a national planning policy statement, either of which “have major implications for the way Government approaches environmental decision making”.²⁸
20. We asked the Minister for Housing and Planning, Matthew Pennycook MP, and the Minister for Nature, Mary Creagh MP, whether they could confirm that section 19 of the Environment Act had been complied with over the course of the Government’s planning reforms. Both Ministers assured us

21 [Environment Act 2021](#), 1 November 2022.

22 [Environment Act 2021](#), 1 November 2022.

23 Department for Environment, Food and Rural Affairs, [Environmental Principles Duty Comes into Force](#), 1 November 2023.

24 Office for Environmental Protection, [OEP Welcomes the Implementation of the Environmental Principles Policy Statement](#), 1 November 2023.

25 Office for Environmental Protection, [Progress in Improving the Natural Environment in England 2023–2024](#), 14 January 2025, p.235.

26 Office for Environmental Protection, [Positive start to implementation of EPPS but more can be done, says OEP](#), 26 February 2025, p.9.

27 Department for Environment, Food and Rural Affairs, [Government Response to the Office for Environmental Protection Review of Implementation of the Duty to Have Due Regard to the Environmental Principles Policy Statement in England](#), 19 May 2025.

28 Town and Country Planning Association ([ESH0061](#)).

that environmental considerations were “at the heart of all policymaking”.²⁹ In regard to the NPPF, the Minister for Housing and Planning stated that, from his perspective, the Government is in compliance with the Environment Act.³⁰ We also asked whether the Ministers would consider publishing their assessment of how the EPPS has been applied in this specific instance. In response, both Ministers stated that there was no statutory requirement for them to do so, that it is not routine for such an assessment to be published, and that this should not be a requirement because space to make Ministerial decisions needed to be protected.³¹

21. Though it may not be routine practice for the Government to publish EPPS assessments, we believe that, due to the intense public interest in the Government’s planning and nature reforms, the Government should publish the EPPS assessments for the sake of transparency and public confidence. The Ministers expressed confidence that the planning reforms are in compliance with the EPPS, which implies that the evidence and material that underpinned the decision-making exists and could, in theory, be made publicly available. We question the Minister for Nature’s statement that absence of a standard format for recording information is a convincing reason for avoiding publication. Moreover, we do not consider the absence of a statutory requirement to publish the EPPS assessment to be a reason to withhold it and this should not preclude the Government from exceeding minimum standards where it is within public interest to do so. We echo the OEP’s previous advice that the Government could be more transparent as to how the EPPS influences decision-making.³²

22. **CONCLUSION**

The Government has assured us that section 19 of the Environment Act 2021, which requires Ministers to give full consideration to the Environmental Principles Policy Statement (EPPS) when making policy, was complied with during the drafting of the latest revision of the National Planning Policy Framework (NPPF) and creation of the Planning and Infrastructure Bill (PIB). Due to the strong public interest in the Government’s planning reforms, it is our view that it is imperative that they publish their considerations as to how the NPPF and PIB comply with the Government’s own Environmental Principles Policy Statement (EPPS).

29 [Q439](#).

30 [Q440](#).

31 [Qq442-443](#).

32 Office for Environmental Protection, [Positive start to implementation of EPPS but more can be done](#), 26 February 2025.

23.

RECOMMENDATION

The Government should set out how the NPPF and PIB comply with the EPPS, in line with sections 17 and 19 of the Environment Act 2021. Two complete and separate statements should be shared with the Committee—one for the NPPF and one for the PIB—in response to this report.

2.2 Cross-Departmental Working

24. To deliver the joint objectives of housing growth and nature recovery, effective cross-departmental working is crucial. Responsibilities for planning, housebuilding and the environment are cross-cutting, touching on the remit of many departments, particularly DEFRA, MHCLG and their arms-length bodies. The matter of effective cross-departmental working is a well-recognised and perpetual challenge for any government.³³ The previous Government published the Environmental Improvement Plan 2023, which highlighted the need for cross-government working in a range of areas, such as nature recovery, adaptation, water efficiency and retrofit programmes.³⁴ ³⁵ The current Government is making efforts to improve efficiencies in this area, such as the review of arms-length bodies and the proposal to implement “mission clusters”, which aims to bring departments together “to agree cross-departmental priorities, increase transparency, reduce duplication, and align spending with mission delivery across Whitehall”.³⁶ In line with this, in January 2025, the Government said that a cross-government working group had been established to support effective implementation of the Environmental Principles duty.³⁷
25. The Minister for Nature assured us that the Planning and Infrastructure Bill (PIB) was the result of substantial cross-government working, between departments such as the Ministry of Justice, HM Treasury, Number 10, DEFRA and MHCLG.³⁸ However, the general consensus from the evidence we received was that collaboration and decision-making between departments

33 This has previously been noted by other Committees, such as the Public Accounts Committee, Twelfth Report of Session 2024–25, [Cross-Government Working](#), HC 75, February 2024.

34 HM Government, [Environmental Improvement Plan](#), January 2023.

35 A revision of the Environmental Improvement Plan is due in 2025: Department for Environment, Food and Rural Affairs, [Environmental Improvement Plan Annual Progress Report: April 2024 to March 2025](#), 14 July 2025.

36 Commons Chamber, HC Deb, [Spending Review: Cross-Departmental Planning](#), 14 July 2025, col 874.

37 Department for Environment, Food and Rural Affairs, [Government Response to the Office for Environmental Protection’s Report on Progress in Improving the Natural Environment in England from January 2024](#), 14 January 2025

38 [Q399](#).

and their associated arms-length bodies must improve further.³⁹ While discussing reforms to the NPPF, Professor Alister Scott, Professor of Environmental Geography and Planning at Northumbria University, told us that MHCLG is seen as responsible for the planning side of the equation, while nature is DEFRA's domain. He noted that while all departments were theoretically signed up to the environmental commitments, in reality, the NPPF, which is an MHCLG publication, did not give proportionate weight to environmental considerations.⁴⁰

26. In her evidence to the committee, Mary Creagh admitted that there had been disagreements between MHCLG and DEFRA during the “gestation” of the Planning and Infrastructure Bill but that she was ultimately “content with where we are”.⁴¹ This reflects the substantial changes to the Bill. The Committee is somewhat reassured that the voice of those advocating for nature brought about significant and positive changes and believe that this is a positive sign in regard to how the needs of the different departments were ultimately captured in the changed Part 3 of the Planning and Infrastructure Bill.

Data Sharing Across Government Bodies

27. Several witnesses were of the opinion that fragmented data systems are also a major barrier to collaboration and successful environmental policy implementation across central and local government bodies and arms-length bodies (ALBs). For example, Dr Iain Boulton from the Association of Local Government Ecologists, said sharing data through local record centres is an essential tool for the success of policies like Local Natural Recovery Strategies (LNRS). However, such centres are under significant financial pressure and therefore struggle to deliver.⁴² Dr John Martin, Associate Professor at the University of Plymouth, agreed and noted that, in terms of implementing LNRS, a lack of up-to-date data could be addressed by a national observatory which could provide consistent data produced by a range of stakeholders. The idea of having a single, unified platform for

39 Dr Gieseckam et al., ([ESH0068](#)).

40 [Q19](#).

41 Q399-400.

42 [Q78](#).

use between bodies was repeated by a range of stakeholders.⁴³ The need to modernise and improve data sharing across regulators was also a key recommendation in the Corry Review.^{44 45}

28. We asked Natural England, the Environment Agency and Homes England how cross-organisational and departmental working could be strengthened. Natural England and the Environment Agency, in particular, were open about the ways in which poor IT and data sharing in their organisations inhibited their work. Mr Philip Duffy, Chief Executive of the Environment Agency, told us that aged IT was a primary issue for the Environment Agency. He agreed with Dr Martin that having “a good geospatially enabled case working system” extended across the DEFRA group would significantly improve collaboration and policy alignment”.⁴⁶ Moreover, he explained that making data easily accessible to the public would have a positive impact as it would allow the public to see the trade-offs and encourage more strategic thinking.⁴⁷
29. Marian Spain, Chief Executive of NE, also noted that better data sharing could help local planning professionals make decisions, for instance in relation to protected sites.⁴⁸ She told us that NE handles 32,000 planning inquiries and consultations each year, but that one third of these could be handled by competent planning officers, particularly in low-risk situations, if they had access to the appropriate data platform - MAGIC (Multi-Agency Geographic Information for the Countryside).^{49 50} She explained:

“It is about having a more comprehensive environmental data system that all decision makers can access and, therefore, see the same evidence and analysis and reach at least better-informed judgments,

43 UK100 ([ESH0046](#)); Natural England ([ESH0058](#)), Plantlife ([ESH0070](#)), Wildlife and Countryside Link ([ESH0081](#)).

44 Department for Environment, Food and Rural Affairs, [An independent review of Defra's regulatory landscape: foreword and executive summary](#), 2 April 2025, recommendation 29.

45 [The Corry Review](#), published on 2 April 2025, evaluated environmental regulation overseen by DEFRA. The review concluded that DEFRA's outdated systems and fragmented data infrastructure were hindering the Department's ability to deliver effective environmental oversight and economic growth.

46 [Q351](#).

47 [Q352](#).

48 A protected site is an area of land or water that is legally protected to conserve habitats, wildlife and/geological interests: Local Government Association, [Protected Site Strategies](#), accessed 20 October 2025.

49 [Qq351-352](#).

50 MAGIC is a website that provides geographic information about the environment from several government arm's-length bodies, most of which are sponsored by DEFRA: [About MAGIC](#), accessed 20 October 2025.

if not always exactly the same judgment. We could even extend that to people like Homes England and other planners so that we are all operating off the same information”.⁵¹

30. We recognise the potential of the National Land Data Programme (NLDP), a government initiative run through the Geospatial Commission, that seeks to help decision-makers to make better and more informed land use decisions that are supported by up-to-date data and modelling.⁵² Stakeholders supported the development of the NLDP as a tool to improve local authorities’ planning decisions, enhance transparency and cross-boundary collaboration.⁵³ In particular, the Local Government Association highlighted it as an example of how better data can support more joined-up thinking.⁵⁴ Nevertheless, concerns were raised about limited public access to the data, confidentiality, and the concern that use of the NLDP may undermine or replace current environmental assessments.⁵⁵ Stakeholders also suggested that the NLDP could be expanded to include data pertaining to species and housing stock, and that it must complement the NPPF.⁵⁶

31. **CONCLUSION**

Improved data sharing is a fundamental enabler of efficient and effective cross-organisational work to deliver sustainable housing. While there is evidence of cross-departmental working between DEFRA and MHCLG on planning, nature and housebuilding, the evidence we have taken suggests that existing data platforms are still siloed within organisations. This inhibits the sharing of geospatial and ecological data which could improve decision making relating to environmental and housing building targets. The sharing of environmental and land use data is a key enabler for improving cross-departmental collaboration, supporting decision-making, increasing overall efficiency and allowing government departments, local planning authorities, and arms-length bodies to collaborate on individual cases, within a single, unified case working system.

51 [Q351](#).

52 Department for Science, Innovation and Technology, [National Land Data Programme: Pilots and Projects Overview](#), 23 May 2023; Ministry of Housing, Communities and Local Government, [ESH0085](#).

53 Margaret Stayton ([ESH0004](#)); The Institute of Environmental Management and Assessment ([ESH0019](#)).

54 Local Government Association ([ESH0101](#)).

55 Margaret Stayton ([ESH0004](#)); The Institute for Environmental Management and Assessment ([ESH0019](#)); Country Land and Business Association ([ESH0074](#)).

56 University of Sheffield ([ESH00029](#)); UK100 ([ESH0046](#)); NatureSpace ([ESH0088](#)).

32.

RECOMMENDATION

Within 12 months of this report, the Government should establish a shared geospatial and environmental data platform, integrated with a case working system. This should be designed for use across government departments, arms-length bodies and local planning authorities to aid decision-making and collaboration. It should be maintained by a cross-departmental team. We note that mechanisms to consolidate and share data—such as the National Land Data Framework and MAGIC (Multi-Agency Geographic Information for the Countryside)—are in development. We recommend accelerating this into a fully operational data sharing platform. This would facilitate cross-government working on nature, planning and housebuilding decisions.

2.3 National Planning Policy Framework (NPPF)

33. The NPPF sets out the Government’s planning policies for England and how it expects them to be applied by planners and decision-makers.⁵⁷ It establishes an overarching framework within which local plans for housing can be developed, helping to determine which planning applications are permitted or rejected.⁵⁸ Announcing NPPF reforms in July 2024, the then Secretary of State for Housing, Communities and Local Government, Angela Rayner, said the changes were necessary to increase the supply of new homes in England to address local housing shortages.⁵⁹
34. On 12 December 2024, the Government published the revised NPPF. The revised NPPF had several aims, including but not limited to:⁶⁰
- Amending current methods for calculating housing needs and supply,
 - Broadening definitions of brownfield land,⁶¹

57 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework - Guidance](#), 12 December 2024.

58 House of Commons Library, [What Next for Planning in England? The National Planning Policy Framework](#), 7 June 2019, p. 5.

59 Commons Chamber, HC Deb, [Planning, the Green Belt and Rural Affairs](#), 19 July 2024, col 313-315.

60 Ministry of Housing, Communities and Local Government, [Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System](#), 27 February 2025.

61 A Brownfield site is usually an old industrial or inner-city site that is cleared for a new building development. The Government defines brownfield land as developed land, that is, or was previously, occupied by a permanent structure. Brownfield land accounts for 8.7% of land in England and 54% of all new homes in 2021/22 were built on brownfield land. See: Homes England, [Fact sheet 7: Homes and different land types - brownfield, greenfield and Green Belt](#), (accessed 10 November 2025).

- Identifying ‘grey belt’ land,⁶²
- Altering the application of the ‘presumption in favour of sustainable development’, and
- Setting ‘golden rules’ for development.⁶³

Presumption in Favour of Sustainable Development

- 35.** The presumption in favour of sustainable development is a central component of the NPPF. It states that planning permission should be granted for developments in areas where planning policies are non-existent, insufficient or out-of-date, provided they are sustainable, align with local area needs, improve the environment, and help mitigate and adapt to climate change.⁶⁴ Paragraph 11(d) states that planning permission should be granted unless there is a strong reason to refuse development, which can include impact on environmental features.⁶⁵ In particular, the presumption does *not* apply if it is likely to have a significant impact on habitats, unless an appropriate assessment has been done and concluded that the proposed development will not adversely impact habitats.⁶⁶
- 36.** As part of the Government’s 2024 review of the NPPF, several changes were made to the presumption in favour of sustainable development. In particular, wording was amended to create the requirement for a ‘strong’ basis for refusing a development. This replaced the requirement for a ‘clear reason’ to refuse development.⁶⁷ The subtle change in wording raised the threshold for refusal and reinforces the presumption in favour of sustainable development.

62 The revised NPPF states that ‘grey belt’ is defined for planning purposes as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns. Grey belt excludes assets where there would be a strong reason for refusing or restricting development. For example, potential Special Protection Areas and Special Areas of Conservation and proposed or designated Sites of Special Scientific Interest.

63 The ‘[Golden Rules](#)’ (para 156) refers to the inclusion of affordable housing, necessary improvements to local or national infrastructure and public access to green spaces,

64 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), December 2024, p.6, para 11.

65 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), December 2024, p.6, para 11.

66 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), December 2024.

67 Ministry of Housing, Communities and Local Government, [Government Response to the Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System Consultation](#), 27 February 2025.

37. Paragraph 14 of the NPPF consultation outcome explains that the primary function of the presumption in favour of sustainable development is to:

“... provide a fallback to encourage planning permission to be granted where plan policies are not up to date, including where there is an insufficient supply of land [...] it ‘tilts the balance’ towards approval by making clear that permission should be granted unless doing so would cut across protections for safeguarded areas, like National Parks and habitat sites ... “⁶⁸

38. Reactions to the renewed wording and approach to the presumption in favour of sustainable development were varied. Stakeholders from the built environment sector were generally supportive; for instance, the Home Builders Federation did not believe that the strengthening of the presumption in favour of sustainable development represented any fundamental shift in how planning policy would operate, nor did the organisation believe that any changes had been made to the definition of sustainable development.⁶⁹ The Chartered Institute of Architectural Technologists believed that while the policy had changed compared to the previous iteration, the focus on sustainability had not been weakened.⁷⁰
39. Others had strong reservations. Many stakeholders expressed concern that the policy would lead to environmental harm and unplanned speculative development.⁷¹ For example, the National Trust argued that the renewed presumption in favour of sustainable development tilts the balance in favour of (potentially) unsustainable development, as development is assumed to take place, which therefore prevents decisionmakers from considering all factors holistically.⁷² Professor Tait and Dr Chapman from the Universities of Sheffield and Oxford similarly stated that the revised presumption in favour of sustainable development “*is likely to be highly destructive for nature*” because tilted balance scenarios usually result in more speculative development on ecologically sensitive land and on more unsustainable sites.⁷³ Academics from the Universities of Leeds, Cambridge and King’s College London stated that it was incompatible with the environmental objectives of the planning system.⁷⁴ While others argued

68 Ministry of Housing, Communities and Local Government, [Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System](#), December 2024.

69 Home Builders Federation ([ESH0025](#)).

70 Chartered Institute of Architectural Technologists ([ESH0027](#)). See also Country Land and Business Association ([ESH0074](#)).

71 Chartered Institute of Housing ([ESH0037](#)); Town and Country Planning Association ([ESH0061](#)); Local Government Association ([ESH0101](#)).

72 National Trust ([ESH0028](#)), para 15; Wildlife and Countryside Link ([ESH0081](#)).

73 Professor Tait and Dr Chapman ([ESH0010](#)) p.2.

74 Dr Philip Graham, Dr Anna Pagani and Dr Michal Drewniok ([ESH0083](#)).

that the presumption could lead to increased pressure on the environment if not carefully managed, or be detrimental to social and environmental outcomes.^{75 76}

40. When we questioned the Minister for Housing and Planning as to whether the presumption may inadvertently permit unsustainable development, he responded that “it is operating in the way that we intend it to operate”.⁷⁷ We are concerned about this based on criticisms of how the presumption worked under the NPPF before it was revised in December 2024. For instance, in 2016, the Town and Country and Planning Association pointed to research which found that the presumption in favour of sustainable development in a previous NPPF enabled development to be consented, even when it did not meet the definition of ‘sustainable development’. This, it argued, led to a presumption in favour of granting permission for development even when adverse impacts outweighed the benefits.⁷⁸ We believe that with the presumption in favour of sustainable development being strengthened in the revised NPPF, there is a risk that the NPPF will facilitate *unsustainable* development, thereby undermining the Government’s objective of simultaneously improving the environment and building homes.
41. We also heard concerns that the presumption in favour of sustainable development and the definition for sustainable development in the NPPF treats environmental priorities as lesser than economic priorities.^{79 80} We do not believe that these concerns are unfounded, due to the Government’s tone and approach to planning reforms. For example, a Written Statement from Matthew Pennycook in March 2025 drew particular attention to the economic dimension of sustainable development: “*The National Planning Policy Framework sets out that significant weight should be placed on the*

75 JLL, [Consultation on NPPF: Sustainable Development Changes](#), 2024; Pennon Group Plc ([ESH0030](#)).

76 The Manchester Social Housing Commission ([ESH0055](#)) raised concerns that the bar for refusal for unsustainable development was too high. The UK Green Building Council ([ESH0064](#)) suggested that guidance should be put in place to prevent construction in unsuitable locations.

77 [Q433](#).

78 Town and Country and Planning Association, [A Crisis of Place: Are We Delivering Sustainable Development Through Local Plans](#), November 2016. The TCPA pointed to case law which had shown that the presumption in paragraph 14 of the NPPF allowed development to be considered sustainable even where the definition of sustainable development is not met.

79 The Institute of Environmental Management and Assessment ([ESH0019](#)); The Wildlife Trusts ([ESH0021](#)), p.4-5; National Trust ([ESH0028](#)) p.3; Pennon Group Plc ([ESH0030](#)) p.4; Healthy Air Coalition ([ESH0041](#)); Hampshire and Isle of Wight Wildlife Trusts ([ESH0071](#)).

80 Sustainable development in the NPPF is defined as having three overarching objectives: environmental, social and economic. Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), p.5, para 8.

need to support economic growth, and timely decision-making".⁸¹ This led to suggestions that the NPPF's definition of sustainable development should be revised, in order to prevent social and environmental objectives from being overridden.⁸²

42. Several stakeholders proposed ways that the presumption could be enhanced. The Institute of Sustainability and Environmental Professionals (ISEP) said there should be clearer and stronger safeguards to ensure that environmental objectives are not overridden when the policy is applied.⁸³ UK100 recommended attaching specific performance standards for carbon and nature to the presumption.⁸⁴ Natural England said that understanding the environmental limits of an area should be the starting point for any development, alongside the principle of 'placemaking', to ensure homes are built in sustainable locations.⁸⁵

43. **CONCLUSION**

We have heard strong and repeated concerns that the environment could be sidelined in the presumption for sustainable development, and that the current revision of the National Planning Policy Framework (NPPF) could result in unsustainable and speculative development. The evidence we received suggests that the presumption in favour of sustainable development, as currently framed, prioritises economic growth over environmental protection, leading to outcomes that are inconsistent with the long-term goals of sustainability and the NPPF's goal of sustainable development.

44. **RECOMMENDATION**

We recommend that the Government do more to ensure that local planning authorities are able to, and do, produce up to date local plans, to ensure that developments are being assessed by appropriate local policies, rather than being subject to the presumption in favour of sustainable development.

81 [Reform of the Statutory Consultee System](#), UIN HCWS510, 10 March 2025.

82 [Qq53-54](#).

83 Institute of Environmental Management and Assessment ([ESH0019](#)). IEMA is now the Institute of Sustainability and Environmental Professionals (ISEP).

84 UK100 ([ESH0046](#)) are a network of 117 cross-party local authorities working towards net zero.

85 Natural England ([ESH0058](#)).

45.

RECOMMENDATION

We recommend that the Government should amend the definition of the presumption in favour of ‘sustainable development’ in the December 2024 revision of the NPPF to give greater weight to environmental sustainability. This should include strengthening safeguards against environmentally unsustainable, unplanned and speculative development. These revised definitions should be provided to the Committee in the Government’s response to this report.

2.5 Spatial Planning

46. The UK is a relatively small country with limited land supply. The top three uses for land in England are agriculture (63.1%), forestry, open land and water (20.1%), and residential gardens (4.9%). As of 2022, only 0.2% of England’s land is classed as vacant, with 8.7% being classed as developed.⁸⁶ Despite the Government’s plans to build 1.5 million homes this Parliament, England lacks a national spatial plan to guide where these homes should be built in a way that supports nature recovery and other land uses.⁸⁷
47. Land use policies in England have previously been described as “disjointed”. Without strategic land use co-ordination, housing targets will risk conflicting with other land use priorities, such as biodiversity, water supply, flooding infrastructure and agriculture.⁸⁸ In addition, housing delivery must align with national and regional economic growth policies and strategies, to ensure that new developments are supported by transport infrastructure, schools, employment opportunities and other essential services.
48. Dr Hugh Ellis of the Town and Country Planning Association said the Government’s current approach to land use policies was incoherent due to the absence of a unified strategy. He warned that, without such a national strategy, England risks making politically and environmentally consequential choices in the dark, for instance when it comes to flooding.⁸⁹ We acknowledge and welcome the Government plans to develop a system of strategic planning across England by the end of this Parliament, via Spatial Development Strategies (SDS), which aim to identify the most appropriate

86 Department for Levelling Up, Housing and Communities, [Land Use Statistics: England 2022](#), 27 October 2022.

87 [Building The Homes We Need](#), UIN HCWS48, 30 July 2024; Ministry of Housing, Communities and Local Government, [Housing Targets Increased to Get Britain Building Again](#), 31 July 2024; Royal Town Planning Institute, [A National Spatial Framework for England](#), accessed 22 October 2025.

88 Parliamentary Office of Science and Technology, [Balancing Competing Land Uses: A Multifunctional Approach](#), 1 November 2024.

89 [Q53](#).

locations for housing, infrastructure and nature restoration in a logical manner. However, our understanding is that these will operate at a regional level and not a national level.⁹⁰

49. England already has an assortment of frameworks, plans and policies to strategically direct housing and nature conservation projects, such as the National Planning Policy Framework (NPPF) and Local Nature Recovery Strategies (LNRS). Yet how these policies are co-ordinated is unclear. For instance, earlier this year there was confusion as to how BNG and the Nature Restoration Fund would work together, if at all. At the time, rumours spread about the possible scrapping of BNG in light of the Nature Restoration Fund.⁹¹ However, in June 2025, it was confirmed via Natural England's Action Plan 2025/6 that BNG would work alongside EDPs and the Nature Restoration Fund and would not be scrapped.⁹² In addition, the OEP found there to be a gap in understanding amongst stakeholders as to how LNRS aligns with agri-environmental schemes and environmental frameworks.⁹³
50. Concern about the apparent lack of clarity and co-ordination between environmental and planning policies was evident when it came to examining how the NPPF interacts with other spatial and environmental planning tools and frameworks. Several organisations emphasised the importance of ensuring that the NPPF and any future Land Use Framework are mutually aligned and reinforcing.⁹⁴ When launching the consultation on the Land Use Framework, the Government described the Land Use Framework as a way to support the Government's plans to support economic growth through building 1.5 million homes, new towns, delivering critical infrastructure, securing clean power, protecting farmland, and restoring the natural world.⁹⁵ The Landworkers' Alliance described such integration as "essential", emphasising that without it, rural workers may struggle to afford to live near their place of work.⁹⁶

90 Ministry of Housing, Communities and Local Government, [Factsheet: Strategic Planning](#), 19 September 2025.

91 ENDS Report, [BNG: No 10 Raising Questions Over Flagship Nature Policy in Growth Push](#), 11 February 2025, (behind paywall).

92 Natural England, [Action Plan 2025/6](#), June 2025, p.3.

93 The Office for Environmental Protection, [Barriers and Enablers to Local Nature Recovery Strategy Development and Their Contribution to Nature Recovery Commitments](#), June 2025, p.13.

94 Community Planning Alliance ([ESH0005](#)); The Wildlife Trusts ([ESH0021](#)); Campaign to Protect Rural England (CRPE) ([ESH0023](#)); The Rivers Trust ([ESH0033](#)); also Professor Malcolm Tait and Dr Kiera Chapman ([ESH0010](#)).

95 Department for Environment, Food and Rural Affairs, [Government Launches "National Conversation" on Land Use](#), 31 January 2025.

96 Landworkers' Alliance ([ESH0065](#)).

51. Several organisations argued that the NPPF does not sufficiently integrate or acknowledge other land use or spatial planning policies, such as Nature Recovery Networks or Local Nature Recovery Strategies (LNRS).⁹⁷ The Wildlife and Countryside Link pointed out that “there are no proposals in the revised NPPF that would further strengthen the link between planning policymaking and planning decision making and LNRS”, nor does it establish a strong link to delivery mechanisms such as BNG or Environmental Land Management Schemes (ELMS).⁹⁸
52. Stakeholders therefore questioned whether LNRS are being sufficiently embedded in the planning system, expressing concern that, without clear status, they risk being sidelined. The UK Green Building Council recommended making LNRS mandatory in local plans, to safeguard areas for habitat restoration.⁹⁹ Others argued that the requirement for Local Planning Authorities to “take account” of LNRS was too vague and that LNRS should be given material weight.¹⁰⁰
53. We also heard general concern about how EDPs will overlap with strategic spatial plans. For example, Victoria Hills of the Royal Town Planning Institute supported a strategic approach to planning but was concerned as to how EDPs would co-ordinate with local statutory spatial plans or strategies.¹⁰¹ Ben Kite, Chair of the Strategic Policy Panel at CIEEM (Chartered Institute of Ecology and Environmental Management), noted that while some environmental matters benefitted from a strategic approach, others would not—such as UK bat species—due to animal behaviour and localised environmental concerns.¹⁰²
54. Moreover, the planning system fails to account for, and adapt to, the modern realities of flooding in England. We concluded in our *Flooding Resilience* report that planning policies treat flooding as a separate issue, independent from the planning system. Flood resilience is inconsistently applied to local plans, and the NPPF does not give enough weight to flood risk, resulting in new development being consented in areas with high flood risk. Integration between planning policy, flood management and sewerage

97 Town and Country Planning Association ([ESH0061](#)); The UK Green Building Council ([ESH0064](#)); Plantlife ([ESH0070](#)) p.7; Country Land and Business Association ([ESH0074](#)); [Q54](#).

98 Wildlife and Countryside Link ([ESH0081](#)).

99 The UK Green Building Council ([ESH0064](#)).

100 Community Planning Alliance ([ESH0005](#)); Plantlife ([ESH0070](#)); [Q94](#).

101 [Qq170–172](#).

102 [Qq174–175](#).

infrastructure, for example, mandating Sustainable Drainage Systems in all new developments, is vital to direct development to safer areas and protect homes from flooding.¹⁰³

55. We asked Ministers Creagh and Pennycook how the various environmental planning policies will align and work together. Matthew Pennycook stated that the policies would result in a “more strategic approach to considering environmental risks and opportunities” and that “obviously, it is really important that they speak to each other”.¹⁰⁴ Mary Creagh stated that the policies were designed to “inform and support the planning system, but not to conflict or overrule it”.¹⁰⁵ However, neither Minister fully explained how the policies would work in practice.
56. In their written evidence to the Committee, MHCLG listed the changes made in the latest iteration of the NPPF to enhance protection of the natural environment and noted that these changes were created in addition to pre-existing policies, such as BNG and the Habitats Regulations. The Ministry also assured us that the “NPPF and Land Use Framework will work hand in hand with Government strategies”.

57. **CONCLUSION**

Stakeholders highlighted the importance of alignment between a national Land Use Framework, environmental policies and planning policies. Such alignment will help direct housing developments and nature conservation or restoration to appropriate locations. It will also help reduce confusion, avoid conflicting objectives, and support coherent decision-making and streamlined delivery. Crucially, it will provide clarity surrounding the application of planning rules and help prevent spurious challenges. In doing so, this supports the Government to achieve its goal of streamlining the planning system, resulting in more positive planning outcomes whilst offering clarity to all stakeholders as to what sustainable development really looks like.

103 Environmental Audit Committee, Fourth Report of Session 2024–25, [Flood Resilience in England](#), HC 550.

104 [Qq435–436](#).

105 [Q434](#).

58.

RECOMMENDATION

Any future national spatial planning or land use policies, such as a Land Use Framework or Spatial Development Strategies, must be aligned with, and complimentary to, all environmental targets, frameworks and policies. These include but are not limited to: Environment Act 2021 targets, the Environmental Improvement Plan, Biodiversity Net Gain, Nature Recovery Networks, Environmental Land Management Schemes, Local Nature Recovery Strategies (LNRS), Environmental Delivery Plans (if in existence) and Flood Plans. The relationships between LNRS and other spatial planning and nature policies, such as the ones noted above, should be made clear. In its response to this report, Government should lay out how each of the policies mentioned above align and work together.

59.

RECOMMENDATION

Local authorities must ensure they have up to date local plans and environmental and climate planning policies. When combined, all local plans and policies should satisfy national environmental targets, allowing for flexibility as to how they meet these targets between areas, in reflection of unique and local environmental characteristics. The Ministry of Housing, Communities and Local Government, and the Department for Environment, Food and Rural Affairs, should work together to audit all local plans once produced to ensure that, collectively, they add up to meet national house building and biodiversity targets.

60.

RECOMMENDATION

We recommend that the Government should explicitly incorporate matters relating to biodiversity into the Duty to Co-operate, enabling local planning authorities to work together to meet national house building and biodiversity targets at a regional level. The Duty to Co-operate on biodiversity should eventually be integrated into Sustainable Development Strategies and be required to align with Local Nature Recovery Strategies.

61.

CONCLUSION

As our recent report on flood resilience stated, the planning system fails to account for the cumulative and cross-boundary impacts of development on flood risk. Land use decisions are often made in isolation, without considering downstream consequences, catchment-scale dynamics, or long-term resilience. This fragmented approach undermines catchment-based and natural flood management, can lead to new development in floodplains, increases exposure for vulnerable communities, and represents a critical weakness in national flood strategy.

62.

RECOMMENDATION

We reiterate that the Government should ensure that flood and climate resilience are embedded into the core tools of planning, regulation, and investment appraisal. The NPPF should be strengthened to prioritise flooding avoidance and climate adaptation, mandating sustainable drainage systems and consider the need for property flood resilience measures in all new developments through building regulations. As stated in our recent report on flood resilience, the Government should initiate a consultation on statutory requirements for assessing the cumulative impact of development on flood risk within local and regional plans by the end of 2025.

3 Environmental Protection

- 63.** This chapter will examine the environmental protections considered in the context of delivering housing developments. It will compare existing and proposed policies, assess the extent to which current measures are sufficient to meet national biodiversity targets, and evaluate whether any changes to environmental protection are consistent with the Government's legally binding environment and nature commitments under legislation such as the Environment Act and Climate Change Act. It will also consider whether the various policies taken together are coherent, and easy to navigate and implement.
- 64.** The chapter begins by examining the Government's main new proposed policy – Environment Delivery Plans (EDPs) and the associated Nature Restoration Fund (NRF) and Overall Improvement Test (OIT), as set out in the Planning and Infrastructure Bill (PIB). It examines how the latter will interact with existing policies and principles, such as the Mitigation Hierarchy (MH) and Biodiversity Net Gain (BNG), and whether together these policies can deliver the Government's aim of delivering a substantial increase in housing whilst protecting and enhancing the environment. The chapter finishes by considering how green and blue infrastructure can be better incorporated into housing developments to meet multiple objectives – such as protecting and enhancing the natural world, increasing wellbeing, and mitigating and adapting to climate change.

3.1 Environmental Delivery Plans

- 65.** The Government argues that the current site-by-site approach to environmental assessments and mitigations is a barrier to house building.¹⁰⁶ As a solution, the Government has proposed Environmental Delivery Plans (EDPs) in Part 3 of the PIB, as part of its plan to build 1.5 million homes by 2029 whilst also restoring nature. EDPs consist of a package of conservation measures which aim to offset and address the environmental impacts of development, paid for through developer contributions into a Nature Restoration Fund (see below). They offer an alternative to traditional site-specific environmental assessments by taking, what the Government deems to be, a more strategic, area-based approach to environmental assessments and mitigations. By taking this approach, EDPs aim to reduce

¹⁰⁶ Ministry of Housing, Communities and Local Government, [Planning Reform Working Paper: Development and Nature Recovery](#), 13 February 2025.

the bureaucratic burdens of environmental assessments for developers, helping them to meet their environmental obligations while simultaneously speeding up construction.

66. Initial announcements of EDPs were met with optimism from the built environment sector, who hoped that the Bill would enable housebuilders to meet their environmental obligations more quickly.¹⁰⁷ The strategic and large-scale nature of EDPs were praised and it is anticipated that the policy will help to unblock projects that have been stalled by policies like requirements on nutrient neutrality.¹⁰⁸
67. However, the EDP proposals have been heavily criticised by others. An open letter from over 50 signatories consisting of environmental organisations, academics and former government advisors argued that the Bill would allow companies to ‘buy out’ of their legal obligations to nature.¹⁰⁹ By contrast, leaders from 33 environmental charities sent a letter to Housing and Planning Minister, Matthew Pennycook MP, and former Environment Secretary, Steve Reed MP, warning that the Bill was not a win for nature.¹¹⁰ Former Conservative Environment Secretary, Baroness Coffey, described the Bill as a “complete and utter assault on our natural environment”.¹¹¹ Various stakeholders criticised the Bill as a “licence to kill”, “cash to trash” and “reckless”.¹¹² While we acknowledge that substantial amendments to the PIB (explored further in this chapter) have been made since these concerns were aired, notable apprehension about the impact of the Bill on the natural world remains.¹¹³ Some stakeholders also told us that nature and the environment were being identified as blockers to building houses, when

107 Home Builders Federation ([ESH0025](#)).

108 [Q12](#). Nutrient neutrality policy requires that all housing developments, in certain areas, must not increase nutrient pollution, such as phosphates and nitrogen, in nearby water catchments.

109 Letter to MPs from Stakeholders, [24 April 2025](#). The Parliament Politics, [Environmental Experts Say Planning Bill Could Threaten Nature](#), 24 April 2025.

110 Letter to Rt Hon Steve Reed MP and Matthew Pennycook MP from Stakeholders, [8 April 2025](#).

111 ENDS Report, [‘Drafted by AI’: Peers Blast Planning Bill’s ‘Authoritarian’ Nature Measures as Ministers Mount Defence](#), 27 June 2025, (behind paywall).

112 Royal Society for the Protection of Birds, [‘Licence to Destroy Nature’: What’s Next for Government’s Bill?](#), 13 June 2025; Friends of the Earth, [The Planning and Infrastructure Bill: Nature’s Not for Sale](#), 20 August 2025; Chartered Institute of Ecology and Environmental Management, [Comment on Planning and Infrastructure Bill 2025](#), 18 March 2025.

113 ENDS Report, [‘The Swift Brick Will Be Back’: The Last-Ditch Efforts to Reshape the Planning Bill](#), 30 October 2025, (behind paywall); ENDS Report, [‘Milestone’ Nature Amendment Passed Following Debate on ‘Ecologically Illiterate’ Planning Bill](#), 30 October 2025, (behind paywall); Chartered Institute of Ecology and Environmental Management, [New Government Amendments to PIB Intended to “Streamline” Natural England’s Planning Advice Role](#), 14 October 2025.

other issues, such as land banking,¹¹⁴ were key obstacles.¹¹⁵ However, Kenny Duncan, Managing Director of Strategic Land, Crest Nicholson, told us that they he did not recognise land banking as significant in blocking house building.¹¹⁶

- 68.** Further concerns were expressed by the environment sector, including insufficient safeguards for protected habitats and species, a lack of pre-consultation with a broad range of stakeholders, and suggestions that an NRF would not be allowed to make a development prohibitively expensive.¹¹⁷ This raised questions as to whether there are, in practice, any limitations as to where developments are located.
- 69.** While EDPs may be effective in some instances, such as widespread pollution and nutrient management, they are often not suitable for species or habitat conservation specific to an area, as these should be compensated for locally.¹¹⁸ It was suggested to us that excessive emphasis on broad-scale, high-level nature recovery risks removing the requirement for site-specific surveys, which are necessary to provide the granular details to identify the scale and type of impacts and develop locally-specific ecological mitigations that successful interventions are dependent upon. The Minister for Housing and Planning assured us that, while there is no explicit requirement to conduct site-specific surveys under the Planning and Infrastructure Bill, the expectation for Natural England to conduct the appropriate scientific analysis on a site marked for development, which may often include site-specific surveys, remains.¹¹⁹ Moreover, EDPs do not guarantee solutions to systemic issues contributing to slow housebuilding rates, such as the lack of expertise and data.¹²⁰
- 70.** The Office for Environmental Protection's (OEP) initial assessment of the PIB in May 2025 was heavily cautionary. Its view was that taking a more strategic approach to development and nature was commendable and that, if well implemented, the Bill could be beneficial for the environment.

114 Land banking is the practice of aggregating parcels of land for future sale or development. It involves buying and holding land with the expectation that its value will appreciate over time, particularly in areas with high demand and limited supply.

115 Baron John Crawford ESH0003; Professor Malcolm Tait, University of Sheffield and Dr Kiera Chapman, University of Oxford SH0010; Chartered Institute of Architectural Technologists [ESH0027].

116 [Q210]

117 Chartered Institute of Ecology and Environmental Management, [Comment on the Planning and Infrastructure Bill 2025](#), 18 March 2025; The Guardian, [Labour's Great Nature Sellout is the Worst Attack on England's Ecosystems I've Seen in my Lifetime](#), 24 April 2025; Nature-Based Solutions Initiative, [Planning and Infrastructure Bill Briefing Note](#), 2 September 2025.

118 NatureSpace ([ESH0088](#)); Arbtech ([ESH0094](#)).

119 Q416-Q421.

120 [Q57](#).

However, the OEP also concluded that the Bill would, in practice, reduce the level of environmental protection provided under existing law and be “a regression”.¹²¹ This assessment is significant given the Environment Act’s requirement for any Bill relating to environmental law to be accompanied by a statement from the relevant Minister confirming that the Bill does not reduce the levels of environmental protection.¹²² The OEP’s conclusion therefore directly contrasts with any Government assurance on this matter.

71. We asked the Chief Executive of NE, Marian Spain, about the OEP’s assessment of the PIB. Ms Spain stated that she supports strategic solutions for nature recovery and that the PIB does not remove basic protections for the environment.¹²³ However, she admitted that NE “would have to take a slightly different risk appetite” on environmental protection in future.¹²⁴
72. In response to intense criticism, in June 2025 the Government introduced amendments to Part 3 of the PIB. The amendments included, but are not limited to, strengthened wording around the overall improvement test (see below), mandatory back-up conservation measures within EDPs, and a requirement for EDPs to use the best available scientific evidence.¹²⁵ When we asked the Minister for Housing and Planning, Matthew Pennycook MP, about the amendments he explained that - in relation to how Natural England will prepare and deliver EDPs - “in essence, what we have done is make explicit what was previously implicit”.¹²⁶ The Minister for Nature, Mary Creagh MP, affirmed that she was still confident that nature would be protected in light of the planning reforms due to Biodiversity Net Gain (see Chapter 3.4).¹²⁷ The OEP welcomed the amendments and determined that a “win-win” for nature and the economy was more likely, *but concerns remain that the PIB will ultimately lower environmental protection*, in some instances.¹²⁸ As such, the OEP’s conclusion may continue to stand in contrast with Government assurances made under section 20 of the Environment Act.¹²⁹

121 Letter from Dame Glenys Stacey to Rt. Hon. Angela Rayner MP, [2 May 2025](#), p.2.

122 [Environment Act 2021](#).

123 This claim was heavily contested.

124 [Q359](#).

125 Ministry of Housing, Communities and Local Government, [Summary: Planning and Infrastructure Bill, Government Amendments to Part 3 \(Lords Committee Stage\)](#), 19 September 2025.

126 [Q402](#).

127 [Q403](#).

128 Office for Environmental Protection, [OEP Welcomes Proposed Amendments to the Planning and Infrastructure Bill](#), 17 July 2025.

129 [Environment Act 2021](#).

The Overall Improvement Test

73. An EDP is finally approved if the Secretary of State for Environment deems that it has passed an overall improvement test (OIT). This means that the measures set out in an EDP would result in a net positive impact on the particular environmental feature that the EDP has been introduced to address and outweigh any negative impacts arising from development.¹³⁰
74. The OEP expressed concerns about the proposed OIT, noting that its wording is weaker than the current Conservation of Habitats and Species Regulations 2017, and that it allows for a high degree of subjectivity.¹³¹ In particular, the OEP criticised the role of the Secretary of State as sole decision-maker in determining whether the OIT has been met, and pointed to what it saw as “the lack of mandatory expert and third-party input [which] risks weakened accountability and poorer quality EDPs”.¹³² To ensure levels of protection are not reduced when applying the OIT, the OEP argued that the “degree of subjectivity and uncertainty currently allowed for in meeting the test would need to be addressed”.¹³³
75. Similar to the OEP, we have concerns about the subjectivity of the OIT and how the test could be misconstrued and interpreted by future officeholders. Ms Spain acknowledged concerns surrounding its subjectivity and assured us that the Secretary of State would be bound by the Environmental Principles, as stated in the Environment Act 2021, when making any decision (for more on this see Chapter 2).¹³⁴ In the interest of transparency, we asked Matthew Pennycook what criteria a Secretary of State would use when judging whether or not an EDP meets the OIT. He referenced the Government’s amendments to the Bill in his response but did not list criteria by which the OIT would be judged.¹³⁵

130 [Qq73-74; Planning and Infrastructure Bill](#) [as amended in Committee], clause 59.

131 Office for Environmental Protection, [OEP Gives Advice to Government on the Planning and Infrastructure Bill](#), 2 May 2025, p.3 & 5.

132 Office for Environmental Protection, [OEP Gives Advice to Government on the Planning and Infrastructure Bill](#), 2 May 2025, p.7.

133 House of Commons Library, [Planning and Infrastructure Bill 2024-25: Progress of the Bill](#), Research Briefing CBP 10277, 5 June 2025, p.34.

134 [Q360](#).

135 [Qq411-415](#).

76. Concern about the subjectivity of the OIT has been echoed by several environmental stakeholders.¹³⁶ While the amendments to the PIB in summer 2025 increased the threshold for passing the test, it did not, in our opinion, address concerns about the subjectivity of the test.¹³⁷

77. **CONCLUSION**

We acknowledge and welcome the Government's amendments in June 2025 to Part 3 of the Planning and Infrastructure Bill. Akin to the OEP, we see the potential benefits of moving towards a more strategic approach to nature recovery. The amendments are a promising step towards ensuring that the proposed strategic approach of Environmental Delivery Plans and the Nature Restoration Fund do not result in the reduction of any environmental protections, risking irrevocable harm to our national ecosystems. Nevertheless, the new approach to meeting existing environmental requirements, introduced in Part 3 of the Planning and Infrastructure Bill, is not enough on its own to ensure that the Government can meet its environmental targets alongside its housing target. Beyond the Planning and Infrastructure Bill, the Government must actively employ the full breadth of policy levers at its disposal to improve the natural environment.

78. **CONCLUSION**

The Government must not veer down the path of viewing nature as an inconvenience or blocker to housebuilding. In most cases housing delivery is delayed or challenged due to unclear and conflicting policies, land banking and skills shortages. Using nature as a scapegoat means that the Government will be less effective at tackling some of the genuine challenges facing the planning system. At worst, this approach could lead to the degradation of the natural world, preventing the achievement of legally-binding climate and nature targets, upon which our society and economy depends.

136 Chartered Institute of Ecology and Environmental Management, [Comment on the Planning and Infrastructure Bill 2025](#), 18 March 2025, p.5; Wildlife and Countryside Link, [Evidence Submission for the Planning and Infrastructure Bill: Call for Evidence](#), 24 April 2025, p.10. The Wildlife and Countryside Link represents 89 nature and climate organisations.

137 Ministry of Housing, Communities and Local Government, [Summary: Planning and Infrastructure Bill, Government Amendments to Part 3 \(Lords Committee Stage\)](#), 19 September 2025.

79.

CONCLUSION

We are concerned about the levels of subjectivity that may arise if the Secretary of State for the Environment acts as the sole and final arbiter of whether an Environmental Delivery Plan satisfies the overall improvement test.

80.

RECOMMENDATION

In the interest of transparency, in response to this report, MHCLG and DEFRA should publish the criteria the Secretary of State will use to determine whether an EDP has passed the overall improvement test or not. It should also set out mechanisms as to how decisions made by the Secretary of State could be scrutinised and held accountable.

3.2 The Nature Restoration Fund and Natural England

81. In December 2024, the Government announced the Nature Restoration Fund (NRF) as part of a package of measures that then became part of the PIB.¹³⁸ Instead of mitigating the environmental impacts of development on a case-by-case basis, developers will be able to discharge their existing environmental obligations by instead paying into the NRF with a single payment that will enable a delivery body to devise and implement conservation measures through an EDP.¹³⁹ The intention is to make environmental assessments and mitigations delivery less bureaucratic for developers and speed up housing delivery. Natural England (NE) is the assumed delivery body for EDPs and the NRF.¹⁴⁰ The PIB will grant new powers to NE to plan, administer and implement projects through the Fund.¹⁴¹
82. Concerns about NE's regulatory independence in the context of the NRF were highlighted to us during the inquiry. Changes introduced in the PIB are thought to create a conflict of interest where NE is both managing the

138 Ministry of Housing, Communities and Local Government, [Planning Proposals Get Britain Building and Turn the Tide on Nature's Decline](#), 15 December 2024.

139 Ministry of Housing, Communities and Local Government, [Factsheet: Nature Restoration Fund](#), 19 September 2025.

140 For example: Ministry of Housing, Communities and Local Government and Department for Environment, Food and Rural Affairs, [Planning Proposals Get Britain Building and Turn the Tide on Nature's Decline](#), 15 December 2024; Ministry of Housing, Communities and Local Government, [Guide to the Planning and Infrastructure Bill](#), Part 3, 19 September 2025.

141 House of Commons Library, [Planning and Infrastructure Bill 2024–25](#), Research Briefing CBP 10216, 21 March 2025, p.7.

NRF and assessing its impact.¹⁴² There is concern that a lack of external oversight could undermine confidence in the system and result in weak accountability and unchecked decisions.¹⁴³ In order to manage this, Wildlife and Countryside Link said that NE must be “carefully structured” to ensure impartiality.¹⁴⁴ Similarly, NatureSpace stated that NE would need to ensure internal differentiation in its role as regulator and implementor, arguing that otherwise the arrangement could be in breach of Competition and Market Authority rules.¹⁴⁵

83. We asked Marian Spain, Chief Executive of Natural England, about the possible need for independent oversight of Natural England whilst handling the NRF. She admitted that the PIB gave Natural England “considerable discretion and considerable power”, but stated that any EDP would be made on evidence that was a result of consultation and scrutiny.¹⁴⁶ Ms. Spain did recognise the concerns we heard but reiterated that the organisation was objective and argued that it already plays a similar role in the context of protected species.¹⁴⁷ She told us that Natural England would not be “the sole arbiter”, noting that the Secretary of State would make the final decisions on EDPs.¹⁴⁸

84. **CONCLUSION**

Considering the conflicting roles Natural England (NE) are expected to play in developing, delivering and assessing Environmental Delivery Plans (EDPs) and the Nature Restoration Fund, we are concerned about the potential for either a real, or a perception of, a conflict of interest. We do not doubt the earnestness and expertise with which NE staff will seek to deliver EDPs, but nevertheless it is essential that robust safeguards are in place to ensure transparency and accountability throughout the regulatory process.

142 Architects’ Climate Action Network ([ESH0100](#)).

143 Chartered Institute of Ecology and Environmental Management, [Comment on the Planning and Infrastructure Bill 2025](#), 18 March 2025, p.5; Wildlife and Countryside Link, [Evidence Submission for the Planning and Infrastructure Bill: Call for Evidence](#), 24 April 2025, p.10.

144 Wildlife and Countryside Link, [Evidence Submission for the Planning and Infrastructure Bill: Call for Evidence](#), 24 April 2025, p.10.

145 NatureSpace ([ESH0088](#)).

146 [Q361](#).

147 [Q362](#).

148 [Q361](#).

85.

RECOMMENDATION

Natural England should publish a clear statement outlining how it will protect against conflicts of interest arising when developing, implementing and assessing Environmental Delivery Plans and the Nature Restoration Fund in response to this report.

86.

RECOMMENDATION

The Government and NE should regularly assess whether the implementation of the EDP policy is reducing public confidence in NE and consider how they can, from the outset, build confidence in NEs ability to be both producer and arbiter of EDPs.

The Impact Assessment of the Nature Restoration Fund

87.

The impact assessment for the Nature Restoration Fund is incomplete. Nutrient neutrality was the only environmental policy considered in the impact assessment of the Bill because it was the only policy that MHCLG had sufficient data on, and because it is a significant environmental obligation for developers.^{149 150 151} The assessment acknowledges this and states that the Ministry was “unable to quantify the impacts [of the NRF] beyond nutrient neutrality”.^{152 153} The impact assessment states that:

“There is very limited data on how environmental obligations affect development. This makes reaching a robust estimate of the impacts associated with the NRF, which will streamline the process for discharging environmental obligations, very challenging. In this analysis, we attempt to identify the magnitude of monetary impacts that will follow from the introduction of the NRF. There is significant uncertainty in this assumption-driven analysis. While the magnitude of the impact is challenging to estimate, we are confident that the direct impacts are positive”.¹⁵⁴

149 Planning and Infrastructure Bill Impact Assessment, [Annex 10: Nature Restoration Fund](#), 6 May 2025, para. 39.

150 Planning and Infrastructure Bill [Impact Assessment](#), 6 May 2025, “Non-Monetised Impacts”, p.6.

151 Nutrient neutrality is the principle that new developments must not increase the levels of nutrients entering sensitive water bodies. For more information see the glossary.

152 Planning and Infrastructure Bill, Impact Assessment, [Annex 10: Nature Restoration Fund](#), 6 May 2025, para. 40.

153 Planning and Infrastructure Bill, Impact Assessment, [Annex 10: Nature Restoration Fund](#), 6 May 2025, para. 39.

154 Planning and Infrastructure Bill, Impact Assessment, [Annex 10: Nature Restoration Fund](#), 6 May 2025, para. 36.

88. We asked the Minister for Housing and Planning, Matthew Pennycook MP, whether EDPs and the NRF could be reliably applied to environmental obligations other than nutrient neutrality, such as species protection, in light of the limited impact assessment. He told us that nutrient neutrality was used as “an indicative example” of an environmental obligation that could be addressed through the NRF. When it came to protected species and habitats, he said that the policy would not result in the deterioration of irreplaceable habitats, as the overall improvement test would not allow it.¹⁵⁵ He added that the Regulatory Policy Committee deemed the approach reasonable, despite limitations on how environmental obligations may impact development.^{156 157}

89. **CONCLUSION**

We accept that the initial impact assessment of the Nature Restoration Fund (NRF) was carried out on the basis of nutrient neutrality, due to limitations with broader data availability. However, as the NRF will have considerable implications for a wide range of environmental issues aside from nutrient pollution, a unidimensional impact assessment is not satisfactory. We welcome the reassurances from the Minister for Housing and Planning that the NRF will not reduce the existing protections of habitats and species. However, this does not provide a satisfactory substitute for a full and independent analysis of the impacts the NRF will have if applied to other habitats and species, which have vastly differing characteristics and management techniques. We believe it unwise to impose a policy solution on a problem that has not been fully accounted for.

90. **RECOMMENDATION**

The Government should revise the impact assessment for the NRF, to take account of a variety of environmental issues, not only nutrient neutrality. It should consider the impact, role and budget of local authorities during the revision process. Only once a fully comprehensive impact assessment of the environmental aspect of the NRF has been completed can informed decisions about the efficacy of the NRF be made. The Government and Natural England must be clearer as to how approaches to the NRF will differ depending upon the environmental issue at hand. If this is not possible, then the NRF should only be applied to nutrient pollution, as we cannot be sure of the impact it will have on the environment otherwise.

155 [Qq409–410](#).

156 [Q410](#).

157 The [Regulatory Policy Committee](#) is an independent body, sponsored by the Department for Business and Trade, that assesses the UK Government’s analysis behind regulatory proposals.

91.

RECOMMENDATION

Given the weak impact assessment of the NRF, we ask the Government to prepare a regulatory assessment of the NRF, if and when it is adopted. This assessment should be completed before Part 3 of the Planning and Infrastructure Bill (PIB) is brought into force and should set out details of how it is to be implemented, such as timelines and actions to be taken by relevant stakeholders. We encourage the OEP to monitor and regularly report on the implementation of the PIB once in statute, including on how successful it is at safeguarding protected habitats and species, the application of the overall improvement test, compliance with the EPPS Duty and the non-regression statement on the face of the Bill.

3.3 The Mitigation Hierarchy (MH)

92. The mitigation hierarchy (MH) is a framework for managing the environmental impacts of development. It guides decisions on how best to avoid, minimise, restore and compensate for harm to habitats and species.¹⁵⁸ Under current planning policy, consent can only be granted if a protected ecological feature is unlikely to be harmed by a development, in a sequential approach. However, this can be overridden if the proposal serves an overriding public interest, there is no alternative option, or compensation for damage is possible. Developers must agree on how damage will be mitigated or compensated for before planning permission is approved.¹⁵⁹
93. The Government's Planning Reform Working Paper, updated in February 2025, sets out a new approach to the MH as proposed in the PIB. The new approach means that developers will no longer be required to carry out site-specific assessments for protected species, habitats or geological features.¹⁶⁰ The Working Paper states that an EDP "would move beyond the

158 The mitigation hierarchy is used to minimise the impacts a development has on biodiversity. The mitigation hierarchy has four levels that should be applied in order of priority: **1) Avoidance:** Preventing or reducing negative impacts on biodiversity; **2) Minimisation:** Reducing the severity or extent of impacts that cannot be avoided; **3) Restoration:** Restoring degraded biodiversity or enhancing existing biodiversity; **4) Offsetting:** Creating new biodiversity or improving the condition of biodiversity elsewhere; this should be used as a last resort.

159 House of Commons Library, [Planning and Infrastructure Bill 2024–25: Progress of the Bill](#), Research Briefing CBP 10277, 5 June 2025, p.48.

160 House of Commons Library, [Planning and Infrastructure Bill 2024–25](#), Research Briefing CBP 10216, 21 March 2025, p.68 & p.71.

perspective of individual projects and would have the flexibility to diverge from a restrictive application of the mitigation hierarchy but only where the delivery body considered this would deliver better outcomes for nature”.¹⁶¹

94. The proposed changes to the application of the MH generated substantial debate. Stakeholders voiced strong objection to the apparent undermining and weakening of the MH, with fears that circumvention of it would make it harder to prevent environmental harm during development.¹⁶² The OEP’s initial advice concluded that, as it stood, the Bill would not maintain the MH. It stated that there was no requirement to distinguish between avoidance, mitigation and compensation, warning that the drafted Bill had the potential to damage the integrity of a protected site, or destroy it, in extreme cases.¹⁶³
95. In evidence to the Public Bill Committee on the PIB on 24 April 2025, the Chief Executive of Natural England (NE), Marian Spain, stated that the PIB “effectively maintains the mitigation hierarchy”.^{164 165} This statement was reported in the media as “an epic misunderstanding”.¹⁶⁶ While giving evidence to our Committee on 25 June 2025, Ms Spain maintained that the PIB would not remove the MH.¹⁶⁷ She argued that site-by-site mitigation can have suboptimal outcomes and the revised approach to the MH would only apply where it would have the greatest (beneficial) impact on the environment. Ms Spain argued that the PIB does not dispose of the MH but applies it “in a more flexible and dynamic way”.¹⁶⁸
96. We asked the Minister for Housing and Planning about the application of the MH under the PIB on 21 July 2025. He confirmed that NE would be able to apply the hierarchy flexibly under the Bill, but that “in the aggregate” the mitigation hierarchy would remain; he explained that this is why Ms

161 Ministry of Housing, Communities & Local Government and Department for Environment Food & Rural Affairs, [Planning Reform Working Paper: Development and Nature Recovery](#), 13 February 2023, para. 23.

162 Joe’s Blooms ([ESH0092](#)); Sue Searle ([ESH0095](#)); Architects’ Climate Action Network ([ESH0100](#)); Better Planning, [Planning and Infrastructure Bill](#), accessed 22 October 2025; Chartered Institute of Ecology and Environmental Management, [Comment on Planning and Infrastructure Bill 2025](#), 18 March, p.5.

163 Office for Environmental Protection, [OEP Gives Advice to Government on the Planning and Infrastructure Bill](#), 1 May 2025, p.5

164 Oral evidence taken by the Planning and Infrastructure Bill Committee (First Sitting) on 24 April 2025, [column 25](#) [Marian Spain].

165 A Public Bill Committee is a group of cross-party MPs who examine and scrutinise a proposed law (a Bill) in detail, taking evidence from experts and suggesting changes before a Bill moves onto the next stage of the legislative process.

166 ENDS Report, [‘Epic Misunderstanding’: Natural England Chief Slammed Following Defence of Planning Bill](#), 28 April 2025, (behind paywall).

167 [Q369](#).

168 [Q369](#).

Spain said that the mitigation hierarchy was “effectively maintained”.¹⁶⁹ The Minister was firm that the Government was not going to remove the flexibility aspect of the new approach to the MH because doing so would undermine the underlying premise of the NRF.¹⁷⁰ The Government has given further verbal and written assurances on the importance of the MH; for instance, in its proposed amendments to the PIB during the Lords Committee Stage.¹⁷¹

97.

CONCLUSION

The relaxation of the mitigation hierarchy (MH) in the Planning and Infrastructure Bill has been a significant point of contention. The MH aims to ensure that harm to nature is first avoided, with destruction and compensation used only as a last resort. We believe that the strict application of the MH on housing developments should remain in place, unless it is proven, using the best available scientific evidence, that nature is better served by not adopting the hierarchy in specific and individual instances.

98.

RECOMMENDATION

Whilst accepting the Minister and NE’s assurance that the MH has remained in place, and would only be set aside where doing so would demonstrably benefit nature, we urge the Government and NE to publish site-specific evidence of the environmental improvements in all occasions where the MH has not been applied. This transparency is necessary to build confidence that nature a) has not been depleted and b) that it is benefitting from this alternative approach.

99.

RECOMMENDATION

We recommend that this evidence should include the systematic monitoring and review of the environmental outcomes on all sites where an EDP has been approved and introduced. NE should publish annual reports detailing the extent to which the MH has been applied to developments with an EDP, alongside evaluations of the effectiveness of the decisions made to improve the environment.

169 [Q422](#).

170 [Q424](#).

171 Ministry of Housing, Communities and Local Government, [Summary: Planning and Infrastructure Bill, Government Amendments to Part 3 \(Lords Committee Stage\)](#), 25 September 2025.

3.4 Biodiversity Net Gain (BNG)

- 100.** BNG is an environmental planning policy aiming to ensure that development ultimately has a positive impact on nature. It requires the biodiversity value of a site to increase by at least 10% post-development compared to the pre-development baseline.¹⁷² Once created or enhanced, the habitat must be maintained for at least 30 years.¹⁷³ Introduced under the Environment Act 2021, BNG was brought into effect in February 2024 and only applies to town and country planning development in England.¹⁷⁴ It is currently being phased in, with DEFRA having overall responsibility for the policy and NE delivering and administering aspects of BNG on DEFRA's behalf.¹⁷⁵ The Government recently concluded, and has not yet responded to, a consultation proposing some tweaks to the application of BNG (see below). We investigated some aspects of BNG in our report—*The Role of Natural Capital in the UK's Green Economy*.¹⁷⁶
- 101.** We heard a broad range of views on BNG over the course of the inquiry. The evidence received suggests that BNG faces several challenges:
- There is little to no monitoring and enforcement of the policy and, without regulation, market-based approaches like BNG will not be fully effective.¹⁷⁷ This is compounded by a lack of post-development monitoring and evaluation to determine the effectiveness of the policy.¹⁷⁸
 - The emphasis of BNG is on compensation and not the avoidance of harm; suggestions have been made that not enough is being done to encourage adherence to the MH.¹⁷⁹
 - The BNG metric may favour the creation of habitats with lower ecological value, as simpler habitats are cheaper and are quicker to establish, limiting the policy's ability to deliver on its full potential.¹⁸⁰

172 Department for Environment, Food and Rural Affairs, [Biodiversity Net Gain](#), accessed 15 March 2024.

173 Department for Environment, Food and Rural Affairs, [Understanding Biodiversity Net Gain](#), 21 February 2023.

174 National Audit Office, [Implementing Statutory Biodiversity Net Gain](#), HC 729, 17 May 2024, p.6, para 4.

175 National Audit Office, [Implementing Statutory Biodiversity Net Gain](#), HC 729, 17 May 2024, p.6, para. 6.

176 Environmental Audit Committee, First Report of Session 2024–25, [The Role of Natural Capital in the UK's Green Economy](#), HC 501.

177 Professor Malcolm Tait and Dr Kiera Chapman ([ESH0010](#)); The Land Trust ([ESH0026](#)).

178 Natural England ([ESH0058](#)).

179 Dr John Martin ([ESH0089](#)).

180 Plantlife ([ESH0070](#)).

Similarly, the policy favours faster and simpler habitat improvements and therefore does not incentivise the improvement or restoration of slower growing habitats, such as mature woodland.¹⁸¹

- It is hard for local authorities to justify asking for more than 10% BNG in their developments, even though a 10% improvement in biodiversity is considered to only be sufficient to maintain the status quo and protect against an overall net loss of biodiversity, rather than providing genuine nature restoration.¹⁸² This is because it is difficult for the BNG metric to fully capture the complexity and functionality of natural ecosystems, and habitat is often being lost as it is being created.¹⁸³
- BNG is being delivered through the promise of high-quality habitat in the future, but if that does not materialise then the policy may result in an overall loss of green space.¹⁸⁴
- The current threshold for triggering enforcement action is deemed by some to be too high, with BNG breaches unlikely to be addressed.¹⁸⁵
- The policy does little to prevent misidentification or deliberate downgrading of a habitat's value.¹⁸⁶
- Local Planning Authorities (LPAs) do not have the necessary powers to ensure that developers adhere to environmental regulations.¹⁸⁷
- On occasions BNG schemes delivered in good faith have failed, such as the Cambridgeshire Highways England project we looked at.
- There are also concerns that in some cases replacing nature on derelict brownfield sites will be more difficult than on greenfield sites creating a perverse incentive in favour of greenfield ahead of brownfield, contrary to the Government's stated policy.

181 The Woodland Trust ([ESH0039](#)); Plantlife ([ESH0070](#)); Department for Environment, Food and Rural Affairs, [Statutory Biodiversity Credit Prices](#), 19 June 2025; The Wildlife Trusts, [A New Era for Nature Positive Development](#), accessed 22 October 2025.

182 Department for Environment, Food and Rural Affairs, [Impact Assessment BNG for NSIPs](#), 25 November 2021; Office for Environmental Protection, [OEP Advice in Response to Biodiversity Net Gain Consultation](#), 18 June 2022; Bioabundance Community Interest Company ([ESH0007](#)); The Wildlife Trusts ([ESH0021](#)); Joe's Blooms ([ESH0092](#)); [Q59](#).

183 Department for Environment, Food and Rural Affairs, [Biodiversity Net Gain and Local Nature Recovery Strategies Impact Assessment](#), 15 October 2019; ENDS Report, [Juniper says BNG 'about keeping things as they are'](#), 25 January 2024, (behind paywall); Wildlife and Countryside Link, [Biodiversity Net Gain and How to Deliver Nature Positive Growth](#), 2 April 2025.

184 Bioabundance Community Interest Company ([ESH0007](#)).

185 The Wildlife Trusts ([ESH0021](#)).

186 Plantlife ([ESH0070](#)).

187 Baron John Crawford ([ESH0003](#)).

It is important to stress that BNG is a policy that is in its infancy and has been widely heralded, here and abroad, as an innovative approach. None of our concerns about its implementation, or suggestions of how it may be more effectively implemented, should be allowed to undermine support for the approach but instead, should be taken as a call for the support needed to give this policy the best chance of delivering the nature benefits alongside the housing growth.

102. For BNG to maximise its potential, clear lines of accountability, and robust monitoring and enforcement mechanisms are essential. Local Planning Authorities (LPAs) LPAs have a duty to review BNG plans and oversee compliance. However, their ability to effectively monitor and enforce BNG is constrained by a lack of staff resource with ecological expertise.¹⁸⁸ The National Audit Office (NAO) identified concerns about the lack of LPA capacity and funding, which is making it difficult for LPAs to monitor and enforce BNG initiatives.¹⁸⁹ The Royal Town Planning Institute found only half of the ecological features promised on BNG sites across 42 developments were present.¹⁹⁰ For more on LPA resourcing, see Chapter 5.
103. We noted in our report—*The Role of Natural Capital in the UK’s Green Economy*—that there is no standardised approach to monitoring ongoing delivery of biodiversity improvements on a BNG site. Evidence from NE suggests that little post-development monitoring occurs and *that LPAs approach BNG applications inconsistently*.¹⁹¹ This is a concern echoed by the NAO, who noted that the “discretionary nature” of LPA enforcement risked inadequate monitoring and enforcement of the policy.¹⁹²
104. We also received evidence which highlighted a knowledge gap in the sector as to who should maintain and manage the biodiversity assets over the full 30-year duration of the policy.¹⁹³ This uncertainty is something we identified during our *Natural Capital* inquiry. It remains unclear as to what solutions are available if the company or body responsible for delivering a BNG site ceases to exist, or if the necessary biodiversity improvements are not delivered.¹⁹⁴

188 Climate Emergency UK ([ESH0011](#)); Country Land and Business Association (CLA) ([ESH0074](#)).

189 National Audit Office, [Implementing Statutory Biodiversity Net Gain - Summary](#), 17 May 2024, HC729, p.10.

190 Royal Town Planning Institute, [Are Developers in England Delivering Ecological Enhancements Required by Planning Permissions?](#), 9 June 2025.

191 Natural England ([ESH0058](#)).

192 National Audit Office, [Implementing Statutory Biodiversity Net Gain](#), HC 729, 17 May 2024, para 15.

193 Horticultural Trades Association ([ESH0042](#)).

194 Environmental Audit Committee, [The Role of Natural Capital in the UK’s Green Economy](#), HC501, May 2025, para. 77.

- 105.** We asked Ms Emma Toovey, Chief Land and Nature Officer at Environment Bank, who would be accountable if BNG targets were not met.¹⁹⁵ She explained that the party responsible for reaching BNG targets and maintaining the land is the one with “the legal interest in the land for the full 30-year term”.¹⁹⁶ She stated that if an organisation fails to deliver BNG, it is the role of a responsible body or LPA to outline a timeline and requirements for remediation measures to be delivered. Failing that, legal powers can be used to order payment, appoint another party to address the failings or take control of the site. Ms Toovey said that once the 30-year period concludes, control of the land reverts fully to the landowner or land manager and the BNG obligation is released.¹⁹⁷ The Government suggests that potential uses for the land could be to continue BNG work or to use the land for alternative environmental schemes—such as carbon offsetting.¹⁹⁸

The Financial Implications of Biodiversity Net Gain on Residents

- 106.** The long-term ecological management of on-site BNG is often funded through service charges paid by residents covering activities such as ongoing monitoring and maintenance of ecological features, and compliance with legal obligations. Costs are usually spread across all households as part of estate service fees.
- 107.** In 2022, the Land Trust found that 43% of surveyed housebuilders planned to manage on-site BNG through third parties, noting that this practise is becoming increasingly common.¹⁹⁹ Concerns were raised that, in instances where estate management companies subcontract the long-term maintenance of a site, the contractors may not pay enough to fully cover the cost of BNG maintenance.²⁰⁰ This can then cause contractors to look for ways to manage the land using cheaper, less effective methods, resulting in biodiversity features being poorly maintained and causing frustration among local residents because they are paying a fee to maintain a particular standard of biodiversity that is not being delivered.²⁰¹ We believe that there is also a risk that estate management fees may increase in order to cover the costs, which would also stoke resentment amongst residents.

195 Environment Bank are one of the leading providers of off-site BNG habitat banks in England.

196 [Q272](#).

197 [Q273](#), [Q281](#).

198 Department for Environment, Food and Rural Affairs, [Off-Site BNG: What Can You Do After 30 Years?](#), 10 October 2023.

199 The Land Trust, [Management Companies and Biodiversity Net Gain \(BNG\)](#), 14 December 2022

200 Professor Malcolm Tait and Dr Kiera Chapman ([ESH0010](#)).

201 [Q268](#).

108. Developers Crest Nicholson and the Berkeley Group told us that higher service charges as a result of BNG are not inevitable and can be prevented if estate management companies are responsible and engaged early in the planning and delivery process.²⁰² David King, Managing Director of the estate management company Meadfleet, also told us that he had seen no evidence to suggest that BNG would increase the cost to households, as BNG costs are absorbed into existing charges.²⁰³ He explained that, in Meadfleet's case, a developer would cover an initial period to ensure that the environmental features establish themselves and do not die. After this initial period, Mr. King argued that residents should not be burdened with an excessive BNG bill to cover the cost of replacing a dead tree, for example.²⁰⁴

Biodiversity Net Gain Consultation

109. BNG has been applicable to small sites since April 2024.²⁰⁵ The Government ran a consultation on the implementation of BNG on small, medium and brownfield sites, from 2 May to 24 July 2025.²⁰⁶ The OEP wrote to the then Secretary of State for DEFRA, Steve Reed, in response to the consultation, stating that his proposal to exempt minor developments from BNG lacked a sufficient evidence base detailing the impact of the proposed exemption, including the risk of habitat loss and negative impacts on the developing biodiversity unit market.²⁰⁷ Stakeholders expressed the view to us on several occasions that it was too early to determine the success of BNG as the policy was, at the time, a little over a year old, and therefore it was too soon to consult on changes to the policy.²⁰⁸ Moreover, there is concern that, as minor developments comprise of approximately 70–80% of BNG transactions to date, a blanket exemption from BNG for small sites would not only harm biodiversity but also damage the emerging biodiversity credit market.²⁰⁹ In *The Role of Natural Capital in the UK's Green Economy*, we recommended that BNG should be left to mature and reviewed in its third reporting year.²¹⁰

202 [Qq247–249](#).

203 [Q264](#).

204 [Q265](#).

205 Department for Environment, Food and Rural Affairs, [Biodiversity Net Gain Now Applies to Small Developments](#), 2 April 2024.

206 Department for Environment, Food and Rural Affairs, [Improving the Implementation of Biodiversity Net Gain for Minor, Medium and Brownfield Development](#), 28 May 2025.

207 Office for Environmental Protection, [OEP responds to Secretary of State on Biodiversity Net Gain consultation](#), 30 July 2025.

208 The Wildlife Trusts ([ESH0021](#)); Home Builders Federation ([ESH0025](#)); Natural England ([ESH0058](#)); Arbtech ([ESH0094](#)); [Q284](#).

209 Royal Town Planning Institute, [RTPI Response to Consultation on Improving the Implementation of Biodiversity Net Gain](#), 11 July 2025. QQ287–288

210 Environmental Audit Committee, First Report of Session 2024–25, [The Role of Natural Capital in the UK's Green Economy](#), HC 501, p.41.

110. The Director for Planning at MHCLG, William Burgon, told us in July 2025 that no decision had been made about a possible BNG exemption for small sites and that the Government was looking at a range of options.²¹¹ Separately, Minister for Nature, Mary Creagh MP, stated that the consultation looked to “streamline” the application of BNG to small sites, with a focus on reducing costs for developers and “broadly maintaining environmental outcomes”.²¹²

111. CONCLUSION

It is too early to assess the overall success of Biodiversity Net Gain (BNG), as the policy is still establishing itself. Its long-term success is dependent upon the establishment of clear and effective regulation. The absence of standardised monitoring and enforcement protocols, clear lines of accountability, and insufficient resourcing, undermines confidence in the policy. Without strengthened oversight and consistent implementation across the country, BNG risks falling short of reaching its full potential.

112. RECOMMENDATION

More clarity is needed on how off-site Biodiversity Net Gain (BNG) projects will be maintained, monitored, and enforced over the full 30-year period. We ask the Government, in response to this report, to lay out clearly who is responsible for oversight and enforcement of BNG throughout its lifespan, and how monitoring and enforcement is standardised across Local Planning Authorities to ensure consistent delivery.

113. CONCLUSION

We are concerned there is a risk that implementing Biodiversity Net Gain (BNG) on housing developments may inadvertently result in unreasonable fees for residents or more expensive housing, which runs counter to the Government’s aim of creating more affordable housing. Communities of all socio-economic backgrounds should be able to afford to live in developments benefitting from onsite BNG.

211 [Q455.](#)

212 [Q404.](#)

114.

RECOMMENDATION

The Government should set out how it plans to control the long-term costs and implementation of on-site BNG initiatives, so they are delivered to sufficient standards and ensure unreasonable costs are not passed onto households; as part of this, the Government should consider the implications of third-party delivery models. In addition, the Government should explain to us what it is already doing to prevent residents from being overcharged for BNG services in its response.

115.

CONCLUSION

Introducing new exemptions to BNG when the policy remains in the early stages of implementation may have unintended consequences, particularly if applied too broadly. We believe more time is needed to assess the effectiveness of BNG before substantive changes are made.

116.

RECOMMENDATION

While the Government has completed its consultation on new exemptions to BNG, additional exemptions must not undermine the effectiveness of the policy, ecosystem integrity, or the establishment of the BNG credit market. Entire exemptions from BNG for small sites would undermine the policy. The Government should not exempt all small sites, but consider minor alterations, to ensure that the effectiveness of the policy is maintained. We reiterate our recommendation in paragraph 124 of our report on The Role of Natural Capital in the UK's Green Economy. The Government should wait at least three years before making any substantial changes to BNG, as this could be viewed as a watering down of ambition.

117.

RECOMMENDATION

In the event that BNG requirements do render brownfield sites less attractive or viable then the Enhanced Regeneration Programme could be an appropriate approach, particularly in areas that require housing growth but have struggled to secure investment, related to viability concerns.

118.

RECOMMENDATION

The Government should conduct an assessment of the capacity and performance of monitoring of BNG commitments by local authorities. Local authorities must understand their responsibilities to ensure that BNG promised is delivered and buy in expertise and resource if it is not currently employed. Local Planning Authorities should be held to account for adequate monitoring of BNG and resourced to deliver it.

3.5 Green and Blue Infrastructure

- 119.** Green and blue spaces, also known as green infrastructure, refer to areas of vegetation and water features in urban areas, such as trees, parks and ponds. Green infrastructure is defined in the most recent revision of the NPPF as:
- “A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity”.²¹³
- 120.** The inclusion of green and blue infrastructure in any housing or urban development has a wide range of environmental benefits, including: improved air quality, urban cooling, support for biodiversity and carbon sequestration. It can also provide an array of social, health and economic benefits, such as enhancing mental health, encouraging physical activity, providing natural flood defences, improving the aesthetics of an area, increasing property values and job creation.^{214 215}
- 121.** Green infrastructure is an often-underutilised approach to flood risk management, despite it being highly cost-effective. Moreover, green and blue infrastructure can contribute towards BNG requirements and support LNRS. For instance, Ben Murphy, Estate Director at the Duchy of Cornwall, told us that incorporating green infrastructure from the outset when building the Nansledan housing development in Cornwall has made it a more attractive place to live and buy property.²¹⁶ He believed green infrastructure is fundamental to placemaking and encourages healthier and more active and sustainable lifestyles.²¹⁷
- 122.** In April 2025, we hosted a workshop with a group of young people, between the ages of 15–18, on what they would like to see in future urban spaces. A strong theme that came through was a stronger presence of green and blue infrastructure, consisting of natural flood defences, green roofs and walls, and protected nature reserves both inside and outside urban areas, which included protecting green belt land.

213 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), December 2024, p.73.

214 Office for National Statistics, [Urban Green Spaces Raise Nearby House Prices by an Average of £2,500](#), 14 October 2019; Science Direct, [The Value of Green and Blue Space: Walkability and House Prices](#), November 2024.

215 Natural England ([ESH0058](#)).

216 We visited Nansledan in May 2025: [Nansledan: A Sustainable Cornish Community near Newquay](#).

217 [Q189](#); [Q205](#).

- 123.** The most recent revision of the NPPF encourages green and blue infrastructure in new developments and suggests incorporating features into developments as mechanisms to aid climate change adaptation, the management of air pollution and promotion of healthy lifestyles.²¹⁸ While this is positive and points policy in the right direction, there is little weight behind this advice. Ed Lockhart, Chief Executive of the Future Homes Hub, suggested that formal recognition of nature and the environment as a part of infrastructure would be beneficial, as it would encourage a more joined-up and strategic approach to housebuilding.²¹⁹ While Mr Alistair Smyth, Director of Policy and Research at the National Housing Federation, told us that a national strategic framework mandating how housing growth could work alongside environmental protection would help to ensure that the twin objectives of nature protection and housing development are met.²²⁰
- 124.** NE's Green Infrastructure Framework, a mechanism for achieving those twin objectives, received broad-based support in the evidence we received.^{221 222} The Framework seeks to help increase the amount of green cover to 40% in urban residential areas.²²³ It includes five key standards which includes the accessible green space standard, the urban nature recovery standard, the urban greening factor, the urban tree canopy standard, and the green infrastructure strategy.²²⁴
- 125.** Organisations including the Town and Country Planning Association, the UK Green Building Council, and the Wildlife Trusts supported stronger policy measures for green infrastructure, advocating for some, if not all, of the Green Infrastructure Framework's standards to become a formal requirement across new developments.²²⁵ Professor Alistair Scott of Northumbria University highlighted Wales's Green Infrastructure Assessment as an example of good practice, but also stated that the Green Infrastructure Framework would be a mechanism to enable social and environmental objectives to be achieved simultaneously in England.²²⁶

218 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), December 2024, paras 20, 96, 164 & 199.

219 [Q20](#).

220 [Q16](#).

221 See: Natural England, [Natural England Unveils New Green Infrastructure Framework](#), February 2023. For an overview of the Green Framework's tools and [case studies](#), see: Natural England, [Green Infrastructure Framework](#), accessed 7 October 2025.

222 Margaret Stayton ([ESH0004](#)); Climate Emergency UK ([ESH0011](#)); Plantlife ([ESH0070](#)).

223 Natural England, [Natural England Unveils New Green Infrastructure Framework](#), 2 February 2023.

224 Natural England, [Green Infrastructure Standards](#), accessed 24 October 2025.

225 Wildlife Trusts ([ESH0021](#)); Town & Country Planning Association ([ESH0061](#)); The UK Green Building Council ([ESH0064](#)).

226 Natural Resources Wales, [Green Infrastructure Assessments: A Guide to Key Natural Resources Wales' Datasets and How to Use Them as Part of a Green Infrastructure Assessment](#), 3 July 2023; [Q17](#).

In 2023, the previous Environment, Food and Rural Affairs Committee conducted an inquiry on urban green spaces and recommended to DEFRA that NE's Green Infrastructure Framework should be made mandatory for local authorities.²²⁷

126. CONCLUSION

We recognise and welcome the recognition of the importance of green infrastructure in the latest revision of the NPPF. However, we heard that more can be done to promote it within the planning system.

127. RECOMMENDATION

The Government should be more prescriptive on the standards of green and blue infrastructure in new developments. The Government should mandate initiatives like Natural England's Green Infrastructure Framework in new and refurbished developments to seek to ensure high standards of green and blue infrastructure are applied consistently across local planning authorities.

128. RECOMMENDATION

As recommended in our Flooding Resilience report, nature-based solutions are highly effective and underutilised in protecting England's properties from flooding. The Government should embed nature-based solutions as a core component of national flood resilience strategy by 2027 and make Sustainable Drainage Systems mandatory in all new developments.

227 Letter from the Environment, Food and Rural Affairs Committee to Rt Hon Steve Barclay MP, [14 March 2024](#).

4 Sustainable Construction

- 129.** While previous chapters have explored the impact of house building on nature and the environment, this chapter explores its impact on climate change through the emissions that are produced in the life cycle of building, maintaining and demolishing homes. The chapter starts by exploring the concept of embodied carbon, before moving to how it can be best measured and incorporated into policy, such as its insertion in the National Planning Policy Framework (NPPF). The chapter ends by considering the role retrofitting and re-use can play in turning unused buildings into homes, and whether this approach can reduce the number of new homes that need to be built, and the volume of embodied carbon associated with housing delivery.

4.1 Embodied and Operational Carbon

- 130.** Embodied and operational carbon refers to the total volume of greenhouse gas emissions associated with the construction, transportation, use, maintenance, demolition and disposal of a building and its materials throughout its lifecycle.²²⁸ Despite its significance, addressing embodied carbon is challenging. Measuring and minimising the embodied carbon of a building is not mainstream industry practice in England, although several leading organisations and practitioners are actively working on it.²²⁹
- 131.** The built environment accounts for approximately 25% of the country's greenhouse gas emissions, however, the impact may be greater.²³⁰ The National Trust calculated that failing to account for embodied carbon could result in underestimating a new building's carbon emission by one third.²³¹ The Climate Change Committee (CCC) advises that the UK's total carbon emissions must fall by 33% by 2035 and 66% by 2040.²³² Consequently, challenges surrounding built environment emissions must be addressed if the UK is to meet net zero by 2050.²³³

228 Parliamentary Office of Science and Technology, [Environmental Housing Standards](#), POST Note 650, September 2021.

229 UK Green Building Council, [Whole Life Carbon Roadmap: Technical Report](#), November 2021.

230 UK Green Building Council, [Whole Life Carbon Roadmap: Technical Report](#), November 2021.

231 *Climate Emergency UK (ESH001)*.

232 Climate Change Committee, [The Seventh Carbon Budget](#), February 2025, p.73.

233 Environmental Audit Committee, First Report of Session 2022–23, [Sustainability of the Built Environment](#), HC103, 26 May 2022, p.5, para 1.

132. The scale of the challenge is stark. Evidence submitted by the Royal Institute of Chartered Surveyors (RICS) estimates that building 1.5 million new homes will release over 80 MtCO₂e, which is 8% of the UK's Sixth Carbon Budget (2033–2037).^{234 235} Similar estimates from the University of Sheffield led academics to conclude that constructing exclusively new build properties to meet national housing targets would be “fundamentally incompatible with the UK's legally binding carbon reduction targets”.²³⁶ Since 1990, the total annual embodied carbon emissions in the UK has not reduced significantly, with any reductions in the carbon intensity of materials used being offset by an increase in construction activity.²³⁷ This raises concerns about the feasibility of meeting housing targets without breaching carbon budgets. In recognition of this challenge, the CCC, in its advice for the Seventh Carbon Budget, recommended that minimum standards for the whole life carbon emissions of products, such as buildings, should be introduced as a necessary step to align development with the UK's net zero trajectory.²³⁸

Improving the Whole Life Carbon Assessments

133. The embodied and operational carbon of a building is usually measured and assessed through whole life carbon assessments (WLCAs), which measure the total carbon emissions associated with a building or development over its entire lifespan. It includes both embodied and operational carbon (see Box 3).²³⁹ WLCAs help identify where carbon savings can be made, supporting more sustainable design and construction choices. Organisations are encouraged to carry out WLCAs as they offer a more complete picture of a building's emissions, identifying where emissions can be most effectively reduced.²⁴⁰ Currently, only 23% of English local planning authorities require WLCAs; excluding London boroughs, the percentage drops to 13%.²⁴¹

234 Royal Institution of Chartered Surveyors ([ESH0090](#)).

235 MtCO₂e stands for million tonnes of carbon dioxide equivalent. This is a unit of measurement for greenhouse gas emissions, which measures how much different greenhouse gases (e.g. methane or nitrous oxide) contribute to climate change and comparing them to the equivalent amount of carbon dioxide.

236 Researchers from the University of Sheffield suggest that the embodied carbon arising from the construction of 1.5 million homes over the duration of the current Parliament would amount to 5-9% of the UK's total carbon budget for 2025–2030. Dr Charles Gillott et al., ([ESH0029](#)).

237 Dr Jannik Gieseke et al., ([ESH0068](#)).

238 Climate Change Committee, [The Seventh Carbon Budget](#), February 2025, p.185.

239 Operational carbon encompasses the carbon emissions generated from the energy used to operate a building throughout its lifecycle, including emissions from sources such as heating and cooling, lighting, appliances and equipment and ventilation.

240 Royal Institution of Chartered Surveyors, [Whole Life Carbon Assessments: A Guide for Clients](#), accessed 24 October 2025.

241 Climate Emergency UK ([ESH0011](#)).

Box 3: Whole Life Carbon Assessments



Source: RICS, [Whole Life Carbon Assessments](#), (2024)

134. While there are examples of LPAs voluntarily requiring WLCAs for major projects, without a set national framework, there is a risk of inconsistency between authorities. This variability poses challenges for developers and built environment professionals working across different local authority areas.²⁴²
135. Our predecessor Committee published a report in May 2022—*Building to Net Zero: Costing Carbon in Construction*.²⁴³ The report found there was no government policy requiring the assessment or control of embodied carbon emissions from buildings, although there was industry support for one.^{244 245} The Committee recommended that a WLCA developed by the Royal Institution of Chartered Surveyors (RICS) should be adopted and used in the absence of an approved national methodology.²⁴⁶ In its response, the previous Government stated that it would “look at” whether government endorsement for a specific standard was needed.²⁴⁷ The RICS tool was cited and endorsed by stakeholders on several different occasions throughout this

242 Miriam Graham CEng MICE ([ESH0048](#)); Part Z ([ESH0075](#)).

243 House of Commons Environmental Audit Committee, First Report of Session 2022–23, [Building to Net Zero: Costing Carbon in Construction](#), HC 103, 26 May 2022.

244 House of Commons Environmental Audit Committee, First Report of Session 2022–23, [Building to Net Zero: Costing Carbon in Construction](#), HC 103, 26 May 2022, p.26, para 69.

245 Part Z ([ESH0075](#)).

246 House of Commons Environmental Audit Committee, First Report of Session 2022–23, [Building to Net Zero: Costing Carbon in Construction](#), HC 103, 26 May 2022, p.26, para 70.

247 House of Commons Environmental Audit Committee, First Report of Session 2022–23, [Building to Net Zero: Costing Carbon in Construction](#), HC 103, 26 May 2022, p.2.

inquiry and there remains a strong desire for government intervention in this area.^{248 249} In the absence of overnment regulation, the WLCA tool developed by RICS has been adopted as an industry standard.^{250 251}

- 136.** Homes England, the Government’s housing and regeneration agency, is developing an “indicator” to measure the embodied carbon of its developments. Its then Chief Executive, Eamonn Boylan, explained to us that the organisation is building upon the RICS standard and adapting it to Homes England’s specific needs.²⁵² This may include, for example, incorporating modern methods of construction into the assessment, which accounts for approximately 25% of Homes England’s affordable housing. Mr Boylan admits that the number of developments coming forward through Homes England under this guidance is small, but that he expected progress in the next two to three years.²⁵³
- 137.** On 7 July 2025, the MHCLG published commissioned research looking at the challenges associated with addressing embodied carbon in new buildings.²⁵⁴ Key conclusions were:²⁵⁵
 - a.** A lack of consistency and quality in reported carbon assessment outputs, limiting the ability to compare results across developments and reduce misreporting.
 - b.** Large gaps in the availability of carbon data pertaining to common building elements and materials.
 - c.** A large variation in the estimated carbon within similar products, resulting in a lack of consistency across carbon datasets.

248 Royal Institute of Chartered Surveyors, [Whole Life Carbon Assessment for the Built Environment](#), accessed 24 October 2025; Royal Institute of Chartered Surveyors, [Whole Life Carbon Assessments: A Guide for Clients](#), accessed 24 October 2025, p.1.

249 Miriam Graham CEng MICE ([ESH0048](#)), p.2; Dr Jannik Gieseke et al., ([ESH0068](#)), p.9; Hampshire & Isle of Wight Wildlife Trust ([ESH0071](#)), p. 12; Part Z ([ESH0075](#)), p.2; Royal Institution of Chartered Surveyors ([ESH0090](#)); [Q19](#).

250 House of Commons Environmental Audit Committee, First Report of Session 2022–23, [Building to Net Zero: Costing Carbon in Construction](#), HC 103, 26 May 2022, p.65, para 2.

251 [Q150](#).

252 Homes England has since appointed a new Chief Executive Office, Amy Rees CB: [Homes England Appoints Amy Rees CB as Chief Executive to Lead Bold Housing and Regeneration Agenda](#), 8 August 2025.

253 [Qq389–391](#).

254 Ministry of Housing, Communities and Local Government, [Cover Note for the Report](#), 7 July 2025.

255 Ministry of Housing, Communities and Local Government, [The Practical, Technical and Economic Impacts of Measuring and Reducing Embodied Carbon in New Buildings: Executive Summary](#), 7 July 2025.

138. The report stated that the Government was considering the findings of the research to determine whether government intervention is appropriate, but did not guarantee any future government action.²⁵⁶

139. We asked the Minister for Housing and Planning, Matthew Pennycook MP, for his opinion on WLCAs. While he recognised that assessing and managing embodied carbon emissions were vital to mitigating climate change and that local authorities and developers could benefit from clearer guidance, he told us that it was not appropriate to make standardised carbon assessments mandatory.²⁵⁷

140. CONCLUSION

Reducing embodied carbon is vital to decreasing the carbon emissions of the built environment and meeting the UK's legally binding climate targets. Considering that key milestones for reducing carbon emissions are rapidly approaching, the Government must accelerate the introduction of policy in this area.

141. RECOMMENDATION

We reiterate and support the recommendation given by our predecessor Committee on embodied carbon and whole-life carbon assessments:

- a.** “The RICS Professional Statement on whole-life carbon assessments is fit for use and already familiar to UK industry. We recommend that, as soon as possible [...], the Government should seek to establish the RICS methodology as the UK industry standard for whole-life carbon assessments”.

142. RECOMMENDATION

Additionally:

- a.** “We recommend that following the introduction of whole life carbon assessments, the Government should develop progressively ratcheted carbon targets for the built environment, to match the pathway to net zero set out in periodic carbon budgets. These ratcheting targets should be reported on annually, and progress reports towards achieving these targets should be published annually as part of the Net Zero Strategy indicators”.

256 Ministry of Housing, Communities and Local Government, [Cover Note for the Report](#), 7 July 2025.

257 [Q446](#).

- b. “We recommend that a clear timeframe for the introduction of mandatory whole-life carbon assessments and ratcheting targets should be set by Government by the end of this year”.

143. RECOMMENDATION

The Government should consider what other steps it could take to encourage low-carbon approaches to building, including reviewing taxation policies to incentivise home owners, housebuilders, landlords and tenants to favour homes with lower levels of embodied carbon.

144. RECOMMENDATION

We recommend that the Government commission a review into Council Tax, Stamp Duty Land Tax and any other tax policies to consider the merit of offering lower bands of taxation for homes with lower levels of embodied carbon.

145. RECOMMENDATION

We would encourage any amendments made to the RICS whole life carbon assessment framework to be accompanied with a formal statement, detailing the amendments and confirming that they have been approved to become part of the UK industry standard. This will ensure clarity for stakeholders and reinforce the updates made using the best available information and research.

146. RECOMMENDATION

Major developers should submit whole life carbon assessments as part of planning applications to local authorities; this should be mandatory for all major developments, as defined in the NPPF. The Government should consult on ways to financially incentivise housing development to lower full lifecycle carbon, such as introducing a levy on new build properties containing higher levels of lifecycle carbon alongside reduced taxation on lower carbon homes.

4.2 Embodied Carbon and the National Planning Policy Framework

- 147.** The December 2024 revision of the National Planning Policy Framework (NPPF) states that the planning system “should support the transition to net zero by 2050” and that it should “contribute to radical reductions

in greenhouse gas emissions”.²⁵⁸ However, the NPPF contains no explicit reference to embodied carbon. This absence was commented on both in the public discourse surrounding the update and in the written evidence we received.^{259 260} The Chartered Institute of Housing called the omission of embodied carbon in the NPPF “concerning”, while it was seen by others as a missed opportunity to strengthen guidance and frameworks.²⁶¹ Researchers from the University of Sheffield stated that it was critical for the NPPF to be amended to include mandatory whole life carbon assessments, along with mandatory pre-redevelopment audits where a building already exists. They suggested that such an approach would incentivise the retrofit, repurposing, and adaptation of existing buildings, promote the use of lower carbon materials, and position brand-new developments as a last resort.^{262 263}

- 148.** The absence of language on embodied carbon in the NPPF raised concerns about delays and inconsistent implementation of environmental standards in the built environment.²⁶⁴ The lack of consideration was interpreted by some witnesses as a sign that the Government is not fully heeding the CCC’s advice and does not fully appreciate the role embodied carbon plays in meeting emission reduction targets.²⁶⁵

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- 258 Ministry of Housing, Communities and Local Government, [National Planning Policy Framework](#), December 2024, para 161; Dr Jannik Gieseckam et al. ([ESH0068](#)).
- 259 Evidence commenting on this included, but is not limited to: Climate Emergency UK ([ESH0011](#)); Council for British Archaeology (CBA) and Chartered Institute for Archaeologists (CIfA) ([ESH0018](#)); Institute of Environmental Management and Assessment ([ESH0019](#)); The Wildlife Trusts ([ESH0021](#)); Dr Charles Gillott et al., ([ESH0029](#)); Green Alliance ([ESH0031](#)); Chartered Institute of Housing ([ESH0037](#)); Chartered Association of Building Engineers ([ESH0045](#)); UK100 ([ESH0046](#)); Historic England ([ESH0051](#)); Ove Arup and Partners ([ESH0052](#)); Rights Community Action ([ESH0054](#)); Dr Jannik Gieseckam (Chancellor’s Fellow at University of Strathclyde); Prof Alice Moncaster (Professor of Sustainable Construction at University of the West of England); Prof Francesco Pomponi (Chair of Sustainability & Environment at York School of Architecture); Prof Aoife Houlihan Wiberg (Professor at University of Bath); Justin Bean (PhD candidate at University of Bath); Dr Stephen Allen (Associate Professor at University of Bath) ([ESH0068](#)); Part Z ([ESH0075](#)); Dark Matter Labs, Ove Arup and Partners, University College London ([ESH0076](#)).
- 260 Cornerstone Barristers, [The New NPPF: Climate Change a Material Consideration in Decision-Taking and Plan-Making](#), 16 December 2024; Bioregional, [NPPF December 2024 Updates Explained](#), 20 December 2024.
- 261 Chartered Institute of Housing ([ESH0037](#)).
- 262 Dr Charles Gillott et al., ([ESH0029](#)).
- 263 This sentiment was shared in other written evidence, such as the Institute of Environmental Management and Assessment ([ESH0019](#)) and Dr Charles Gillott et al., ([ESH0029](#)).
- 264 Margaret Stayton ([ESH0004](#)); Institute of Environmental Management and Assessment ([ESH0019](#)); Qq7–9.
- 265 Institute of Environmental Management and Assessment ([ESH0019](#)); Dr Charles Gillott et al., ([ESH0029](#)).

- 149.** We have heard that Building Regulations may be a more appropriate, or complementary, place to lay out embodied carbon regulations, as opposed to the NPPF. The Chartered Institute of Building Engineers stated that the duty to demonstrate compliance with Building Regulations is required at the technical design stage of a building and therefore it is logical for embodied carbon calculations to be submitted simultaneously.²⁶⁶ The industry-backed Part Z campaign also seeks to incorporate whole life carbon assessments into UK Building Regulations. It aims to limit the embodied carbon of new buildings by aligning with RICS' WLCA and has achieved support from across the sector, including from organisations such as the Royal Institute of British Architects and the Chartered Institution of Building Engineers.²⁶⁷
- 150.** The introduction of whole life carbon assessments for buildings through Building Regulations was a recommendation made by our predecessor Committee in 2022. It suggested that such a requirement should also be reflected in the planning system. In response, the previous Government stated that they would consult on their approach to embodied carbon in 2023.²⁶⁸ In addition, the previous Government stated, in 2024, that it would consult on approaches to measuring and reducing embodied carbon “in due course”.²⁶⁹ It is apparent to us that this has not been done. We believe that the current Government should honour the promise of the previous Government and deliver a consultation on assessing for and regulating embodied carbon in England.
- 151.** In written evidence, the Ministry of Housing, Communities and Local Government stated that the NPPF sought to provide freedom for local authorities and developers to seek to use carbon accounting as they wish, but the Ministry recognised the need for clearer guidance. As such, MHCLG stated that they are planning on updating Planning Policy Guidance to help local authorities and developers consider carbon emissions as part of their plan making and development process.²⁷⁰

266 Chartered Association of Building Engineers ([ESH0045](#)).

267 Chartered Institute of Architectural Technologists ([ESH0027](#)); Chartered Association of Building Engineers ([ESH0045](#)); Dr Jannik Gieseke et al., ([ESH0068](#)); Part Z ([ESH0075](#)).

268 Environmental Audit Committee, Third Special Report of the Session 2022–23, [Building to Net Zero: Costing Carbon in Construction: Government Response to the Committee's First Report](#), HC 643, p.4, para 7.

269 Department for Levelling Up, Housing and Communities, [The Future Homes and Buildings Standards: 2023 Consultation](#), 4 March 2024, para 1.1.4; Chartered Institute of Housing ([ESH0037](#)).

270 Ministry of Housing, Communities and Local Government ([ESH0085](#)).

152. CONCLUSION

The revised NPPF does not contain explicit reference to embodied carbon, despite a widely held opinion that the NPPF must play a central role in supporting low-carbon housing. This oversight limits the NPPF's ability to minimise carbon emissions from new buildings and undermines efforts to meet the UK's emission reduction targets.

153. RECOMMENDATION

The December 2024 revision of the NPPF should be updated to include clearer and stronger expectations on embodied carbon for new developments. The current Government should also honour the promise made by the previous Government and conduct a consultation on how embodied carbon should be measured and reduced in UK buildings, potentially through Building Regulations, without compromising levels of operational carbon; this consultation should commence no later than March 2026.

4.3 Alternative Building Materials

- 154.** There are a variety of ways the embodied carbon of a building can be lowered, including the use of alternative building materials for construction and insulation, such as timber, clay, hemp and wood fibre.²⁷¹ During our visits to Nansledan in Cornwall and the Green Village at the TU Delft Campus in the Netherlands, we saw examples of properties built using timber-frames, hemp insulation and other materials which had the benefit of reducing the embodied carbon of the building and supporting local business.²⁷²
- 155.** Currently in Scotland, 90% of new homes are built using timber, and it is increasingly being seen as a viable alternative to traditional materials, such as concrete or steel.²⁷³ Chris Thompson, founder of the SME housebuilder Citu, explained that alternative materials, such as timber frames, are already available and viable alternatives to cement and concrete, particularly for buildings under 18 metres in height.^{274 275} However, as

271 Paul Brannen ([ESH0002](#)); Confederation of Timber Industries and Timber Development UK ([ESH0059](#)).

272 Nansledan, [Low Carbon Construction in Nansledan - A Net Zero Aim](#), accessed 28 October 2025; The Green Village, [Fieldlab Voor Duurzame Innovatie](#), 28 October 2025; TU Delft Campus, [Pioneering for Change](#), accessed 28 October 2025

273 Department for Environment, Food and Rural Affairs, [Timber in Construction Roadmap 2025](#), 3 March 2025; Human Nature Places ([ESH0049](#)).

274 Fire safety regulation prohibits the use of timber for buildings taller than 18 metres.

275 [Q241](#).

noted by the previous Environmental Audit Committee, concerns do exist surrounding the material safety and fire risk of using alternative materials, such as timber, in buildings.²⁷⁶

- 156.** The Government has launched its Timber in Construction Roadmap 2025, which looks at timber's potential to reduce embodied carbon and reduce emissions through modern methods of construction.²⁷⁷ Mary Creagh highlighted that using timber for construction has the added benefit of utilising offcuts and co-products for structural and non-structural parts of a home, such as furniture and flooring.²⁷⁸
- 157.** Whilst we strongly welcome this Roadmap, we also believe more could be done to incentivise the use of low carbon, alternative building materials. The Government has acknowledged that procurement signals and policies can increase public demand for sustainably sourced timber.²⁷⁹ Brian Berry, Chief Executive of the Federation of Master Builders, told us that the clear labelling of products with lower embodied carbon would enable builders, specifiers and homeowners to easily identify lower carbon products and estimate the embodied carbon of their buildings.²⁸⁰

158. CONCLUSION

Alternative building materials, such as timber and hemp, offer practical and effective ways to reduce the embodied carbon of buildings. Their use supports Government ambitions to reach net zero and continue to deliver on their sustainable housing target, in addition to stimulating economic growth through the development of relatively nascent industries.

159. RECOMMENDATION

Whilst the Government has taken initial steps to promote timber through the Timber Construction Roadmap, there remains a lack of clear incentives and guidance to encourage the adoption of low-carbon material in housebuilding. The Committee believes the Government should take a more active role in shaping how low carbon materials are popularised. This could be done by providing market signals that reward sustainability. One such measure could be the introduction of eco-labelling for building products, enabling builders and developers to identify materials with lower embodied carbon.

276 House of Commons Environmental Audit Committee, First Report of Session 2022–23, [Building to Net Zero: Costing Carbon in Construction](#), HC 103, 26 May 2022, p.39.

277 Department for Environment, Food and Rural Affairs, [Timber in Construction Roadmap 2025](#), 3 March 2025; [Q446](#).

278 [Q446](#).

279 Department for Environment, Food and Rural Affairs, [Timber in Construction Roadmap 2025](#), 3 March 2025.

280 [Q324](#).

160.

RECOMMENDATION

The Government could also consider other financial incentives in product areas where the cost differential makes adoption of lower embodied carbon products unattractive and support for manufacturing set up of lower embodied carbon products. We recommend that the Government consult, by April 2026, on what further incentives could shift the dial in this area.

4.4 Demolition and Retrofit

161. The ambition to deliver 1.5 million new homes this Parliament could be met, in part, by retrofitting, repurposing and upgrading existing buildings, and bringing into use properties that are currently vacant. According to the Office of National Statistics, in 2021 there were 1.5 million unoccupied homes in England; of these, 90% were deemed to be truly vacant, meaning that they were not being used as second homes or holiday rentals.²⁸¹ This is similar to other estimates of 1.6 million, but above estimates from MHCLG, which state that there are around 720,000 vacant dwellings in England.^{282 283} Additionally, Historic England estimates that repurposing existing buildings, such as commercial properties and historic buildings, could create 670,000 homes.²⁸⁴ Together, the figures highlight the potential role that retrofitting and adapting existing buildings could play in meeting national housing and environmental demands.
162. Retrofitting and repurposing properties has many benefits, for instance limiting pressure to build on undeveloped land, regenerating urban areas, preventing the displacement of local residents, protecting local and national heritage, preserving green spaces and preventing ecological disruption often associated with new developments.²⁸⁵ Moreover, retrofitting produces only one third of the embodied carbon emissions of a new build property, meaning it is more compatible with Net Zero targets.²⁸⁶

281 Office for National Statistics, [Number of Vacant and Second Homes, England and Wales: Census 2021](#), 27 October 2023.

282 Dr Philip Graham, Dr Anna Pagani and Dr Michal Drewniok ([ESH0083](#)).

283 Ministry of Housing, Communities and Local Government, [Dwelling Stock Estimates, England: 31 March 2024](#), 22 May 2025.

284 Historic Houses ([ESH0008](#)); Historic England ([ESH0051](#)).

285 Council for British Archaeology (CBA) and the Chartered Institute for Archaeologists (CIfA) ([ESH0018](#)); National Trust ([ESH0028](#)); Conor Crooks ([ESH0038](#)); Dark Matter Labs, Ove Arup and Partners, and University College London ([ESH0076](#)); Policy Impact Unit and Net Zero What Works Centre at University College London ([ESH0082](#)); Georgina Schueller ([ESH0084](#)).

286 Dr Philip Graham, Dr Anna Pagani and Dr Michal Drewniok ([ESH0083](#)),

163. There are several ways to encourage the retrofitting and repurposing of buildings. Local authorities such as Westminster Council have adopted a ‘Retrofit First’ policy, which requires developers to explore retrofitting a building before demolition is considered. If demolition is proposed, then pre-redevelopment audits are required in order to assess different re-construction options.²⁸⁷ The policy assesses the whole-life carbon emissions of a building and also requires circular economy statements for any project involving demolition, to maximise the recycling of construction materials.^{288 289 290} Similar approaches appear to be popular elsewhere in London, with Camden Council and The City of London also promoting reuse of existing buildings over demolition. However, examples of such a policy outside of London are more limited.^{291 292} We also received more innovative suggestions, such as using estates earmarked for demolition for training retrofit workers.²⁹³

VAT on Retrofit

164. We heard that it is often cheaper to demolish and rebuild a property, or build a completely new property on a new site, than retrofitting an existing one.²⁹⁴ This is partly because inequity exists between the VAT rates on new build developments and retrofitted ones, with 20% VAT rates being applied to the supply and construction of retrofit projects, and 0% to new builds.²⁹⁵ The disparity creates a financial disincentive for retrofitting, which discourages efforts to promote sustainable urban development in the form of retrofitting and regenerating properties. The debate surrounding the VAT of retrofit projects is well-recognised and was noted by Eamonn Boylan, the previous Chief Executive of Homes England, who admitted that new builds had “a more favourable VAT treatment than retrofit and remediation”.²⁹⁶

287 Pre-redevelopment audits assess and examine a building’s materials, structure and potential for reuse or refurbishment.

288 City of Westminster, [New Policy to Make Westminster a ‘Retrofit First’ City](#), 4 March 2024.

289 Green Alliance ([ESH0093](#)).

290 A circular economy statement is a document outlining how a development will minimise waste throughout the lifecycle of a building, from construction to operation and demolition: Mayor of London, [Circular Economy Statement Guidance | London City Hall](#), accessed 28 October 2025.

291 Lichfields, [Retrofit First: The City, Camden, Now Westminster - Who Will Be Next?](#), 3 April 2024.

292 Daniel Scharf ([ESH0006](#)).

293 Georgina Schueller ([ESH0084](#)).

294 [Q344](#).

295 London Assembly, Planning and Regeneration Committee, [Retrofit vs Rebuild?: Reducing Carbon in the Built Environment](#), February 2024; Council for British Archaeology (CBA) and the Chartered Institute for Archaeologists (CIfA) ([ESH0018](#)); National Trust ([ESH0028](#)); Dr Philip Graham, Dr Anna Pagani and Dr Michal Drewniok, ([ESH0083](#)); Georgina Schueller ([ESH0084](#)).

296 [Q385](#).

165. The Federation of Master Builders estimated that cutting VAT on the labour element of retrofit improvements on property, from 20% to 5% would have generated an additional £15.4 billion spent on home improvements between 2021–2025; in addition to creating over 300,000 jobs and adding £24.8 billion in Gross Value Added.²⁹⁷

166. CONCLUSION

Retrofitting existing buildings is more environmentally friendly and sustainable than demolition and new construction. We accept that not all existing properties can be converted into residential buildings, and do not deny that some new homes do need to be built. However, prioritising the retrofit and regeneration of existing buildings could contribute substantial numbers towards the Government’s 1.5 million house building target, with minimal harm to nature and with minimal carbon emissions.

167. CONCLUSION

Although retrofit and regeneration of buildings is already encouraged in policy, it is often sidelined. Strengthening focus in this area should be prioritised, considering the range of benefits associated with doing so.

168. RECOMMENDATION

Government should prioritise and incentivise retrofitting over demolition by strengthening requirements to reuse, repurpose and refurbish buildings before any demolition. It is contrary to the Government’s environmental objectives to incentivise carbon-intensive new building over the re-use of existing sites. To encourage the retrofit and repurposing of existing buildings, the VAT on retrofit projects should be reduced from 20% to reflect environmental benefits and support uptake. Government should therefore confirm that a property brought back into use would count towards its, and a local authority’s housing target.

169. CONCLUSION

As with the embodied and operational carbon recommendation (Para 138nb mbnj) we believe that the Government should investigate how it can use the tax system to reduce the tax burden on properties that reduce their carbon footprint and/or increase the tax burden on environmentally regressive properties to create a greater incentive for making retrofitting decisions that reduce the carbon footprint of a home, as part of the review we recommended.

297 Federation of Master Builders, [Cut the VAT: A Proposal for Building Back Better and Greener](#), 1 March 2021.

5 Skills and Resourcing

- 170.** The success of the Government’s planned expansion of the number of homes built hinges on one critical factor: a skilled and sufficiently resourced workforce. Ecologists and planners are vital to the success of the Government’s planning reforms. Without the knowledge and skills in place—both now and in the future—it will be impossible for the Government to deliver on any of its ambitions. This chapter explores whether there are enough ecologists, planners and workers in the construction industry to deliver the Government’s aim to build 1.5 million homes sustainably, key challenges the workforce faces, and how these might be addressed. It focusses on whether there is sufficient read across between planners and ecologists to ensure that planning decisions are ecologically informed and how this can be improved. Finally, the chapter concludes by examining whether Natural England—tasked with overseeing the Government’s sustainable housing growth agenda—is adequately resourced to deliver on its new responsibilities.

5.1 Ecology

- 171.** Ecologists play a critical role in informing planning decisions and assessing the environmental impacts of these decisions. Yet, throughout this inquiry, stakeholders have painted a bleak picture of the status of the local authority ecology sector in England. We have been told that the sector is severely understaffed, with poor pay, poor training, poor work-life balance, poor working conditions, contract uncertainty and a lack of career progression.²⁹⁸ Only 26% of local authorities have in-house ecological expertise and, as a result, it is not uncommon for work to be contracted out to external organisations, such as a local Wildlife Trust.^{299 300} This study was conducted in 2022, prior to the introduction of mandatory Biodiversity Net Gain, which creates duties for local planning authorities. According to practising local authority ecologist, Sarah Postlethwaite, one of the best

298 [Q113](#); [Q130](#).

299 Climate Emergency UK ([ESH0011](#)).

300 The Wildlife Trusts, [ESH0021](#); Wildlife and Countryside Link, [ESH0081](#); [ALGE-ADEPT Report on LPAs and BNG.pdf](#) The Wildlife Trusts ([ESH0021](#)); Wildlife and Countryside Link ([ESH0081](#)); Department for Environment, Food and Rural Affairs, the Association of Local Government Ecologists, and the Association of Directors of Environment, Economy, Planning and Transport, [Survey of Local Planning Authorities and their Ability to Deliver Biodiversity Net Gain in England](#), June 2022.

resourced ecology teams she is familiar with employs only 5.6 FTE (full-time equivalent) ecologists covering five former local planning authority areas, with 572 planning consultations per ecologist, per year.³⁰¹ This reflects reports from the Chartered Institute of Ecology and Environmental Management (CIEEM) that ecologists are overstretched, and assertions from the Planning Advisory Service that the lack of environmental expertise in the public sector is the primary barrier to fully addressing environmental issues in planning decisions.^{302 303}

- 172.** Councillor Richard Wright, from the District Council’s Network Planning Association and North Kesteven District Council, similarly noted:

“Across central Lincolnshire, which covers roughly 900 square miles, we have one ecologist, and we are pretty lucky that we have that, because some local authorities struggle to get any at all. Quite often it is about buying in that advice on a consultancy level. We employ one. We would like to employ far more than that because of the amount of work that is coming downstream not just on the permissions but on the BNG side. The amount of work that is generated is phenomenal”.³⁰⁴

- 173.** In 2021, our predecessor Environmental Audit Committee published “*Biodiversity in the UK: Bloom or Bust?*”. Within this report, it was noted that

“A barrier to achieving all of the Government’s policies is a severe skills shortage in ecologists. This is the result of cuts to public spending on biodiversity. Local authorities do not have enough ecologists to oversee the Biodiversity Net Gain [BNG] policy.”

It called for the Government to invest in training and skills in chartered ecology as part of the Government’s promised investment in Green Jobs.³⁰⁵

Challenges Facing the Ecological Workforce

- 174.** There are several barriers to pursuing a career in ecology, with low pay being one of them.^{306 307} Ben Kite from The Chartered Institute of Ecology and Environmental Management (CIEEM) told us that Office for National Statistics data suggested that the graduate starting salary for an ecologist

301 Sarah Postlethwaite ([ESH0087](#)).

302 Chartered Institute of Ecology and Environmental Management, [Are Local Planning Authorities ready to monitor mandatory BNG?](#), July 2023.

303 Planning Advisory Service, [Barriers and Challenges for Environmental Assessment](#), accessed 29 January 2025.

304 [Q41](#).

305 Environmental Audit Committee, First Report of Session, [Biodiversity in the UK: Bloom or Bust?](#), HC 136, 23 June 2021, p.6.

306 [Q113](#); [Q130](#).

307 [Q322](#).

is about £7,000 less than a nurse or a teacher and about £9,000 less than a planner. He also stated that bodies like Natural England, a DEFRA agency, paid their ecologists less than equivalent grades in other parts of DEFRA.³⁰⁸ Ms Postlethwaite similarly noted that the salary for an ecologist can be just above minimum wage, with a salary range of £26,000 - £29,000 per year. This is despite the role requiring a high level of education and qualifications, with a specialised knowledge base and skillset.³⁰⁹

- 175.** The mental health of ecologists also warrants greater attention. Witnessing environmental degradation first-hand can be emotionally challenging, especially for those who have committed to a career in environmental protection and have direct exposure to the impacts of biodiversity loss. Evidence presented to us highlighted that this exposure can contribute to emotional distress and eco-anxiety of professionals in the sector.³¹⁰ We also heard that the sector attracts a higher proportion of neurodiverse staff than other industries, yet workplaces are often poorly adapted to support them.³¹¹ As a result, talented individuals are being lost from the sector. Employers and organisations should recognise and take seriously both the mental health needs and the importance of inclusive workplaces for neurodiverse individuals, ensuring that the appropriate mechanisms are in place to foster a supportive and productive working environment.

Training and Qualifications

- 176.** Becoming a fully trained ecologist takes several years of study, practical experience and ongoing professional development. Addressing the current skills deficit requires sustained investment and prioritisation of training pathways, workforce planning and progression opportunities. Given the time required to train ecologists to a suitable standard, a lag in workforce readiness is inevitable. It is therefore essential that the Government accelerates the training of new ecologists and the upskilling of those already practising.³¹² This will support the successful delivery of environmental planning policies such as BNG and help ensure that these policies are delivered competently from the outset, preventing costly delays and mistakes in the future.
- 177.** University training courses for ecologists must equip students with practical skills for professional roles, not only academic study. According to CIEEM, not one ecology university course includes BNG, pointing to a notable

308 [Q130](#).

309 [Q112](#).

310 Sue Searle ([ESH0095](#)).

311 [Q113](#).

312 [Q303](#).

disparity between course content and industry needs.³¹³ Both CIEEM and the Institute of Sustainability and Environmental Professionals (ISEP),³¹⁴ two leading UK environmental professional bodies, have advocated for better collaboration between experts and industry to devise courses fit for the workplace.^{315 316}

- 178.** While good examples of ecological training programmes and university degrees do exist, we heard of a broad variation and little standardisation in the quality and the content of these programmes, which can lead to students missing out on fundamental aspects of their education.³¹⁷ Sue Searle, Managing Director and Principal Ecologist from Ecology Training UK, told us:

“Last week I saw a student who had gone all the way through a degree and is now doing a PhD. She had never seen a British reptile. I took her on a reptile course [...] I was like, “Wow, you have been through the whole education system, and you never even saw a reptile?”. It is the same with all the botanical skills that they could be learning, that could be useful in the future, particularly taxonomic identification skills. They are just not there. Some courses teach them, but a lot of courses are just training people to be scientists, which is not that helpful”.³¹⁸

Training for Biodiversity Net Gain

- 179.** This is also true for upskilling courses on relatively new government policies such as BNG. Ms Searle told us that the training for BNG was inadequate, reporting that she needed to complete nine courses before fully understanding the policy. She stated that no one was able to provide her with a comprehensive list of skills that would be needed to implement the policy.³¹⁹ She added that a policy such as BNG requires a broad range of skills, including botanical skills, habitat mapping, habitat management, GIS and IT skills, and it can be difficult to find one person who possesses

313 Chartered Institute of Ecology and Environmental Management, [The Green Careers Crisis: A Journey to Recovery](#), 16 October 2024.

314 ISEP was formally known as IEMA (The Institute of Environmental Management and Assessment).

315 [Q335](#).

316 Chartered Institute of Ecology and Environmental Management, [The Green Careers Crisis: A Journey to Recovery](#), 16 October 2024.

317 [Q335](#).

318 [Q331](#).

319 [Q303](#).

all of these competencies.^{320 321} Without standardised training, the quality of BNG programmes, and the competence of those delivering them, will vary considerably.³²² Such inconsistency will result in varying levels of success and risks undermining the effectiveness of government policies and ambition.

Ecologists and Planning

- 180.** In addition to ecological expertise, there is a pressing need to train ecologists with a working knowledge of the planning system, to better advise on land use and planning decisions. Ben Kite of CIEEM told us:

“It doesn’t help if you are incredibly expert in a particular type of living organism if you don’t know how to advise land use planning decisions to bring about a better outcome for those things. It is a particular part of the ecology sector that we need to upskill”.³²³

- 181.** CIEEM has advocated for greater prominence of a ‘Planning Ecologist’ pathway, whereby a qualified ecologist undertakes additional training in development and planning to bridge knowledge gaps and improve collaboration between the ecology and planning sectors.³²⁴ While the role of a Planning Ecologist already exists, we believe that it could be given more visibility.³²⁵ Routes towards this specialisation should be formalised and popularised – with both degree and non-degree options, such as apprenticeships, continuous professional development (CPD) courses and integrated accreditation schemes.

Addressing Shortfalls in Ecological Expertise

- 182.** We acknowledge the work government is doing to increase the capacity and capability of ecologists within the planning system, in particular the £10 million of funding for local planning authorities to implement

320 Geographic Information System is a computer-based tool that captures, stores, analyses and visualises spatial and geographic data to help understand patterns and relationships based on the information: National Geographic, [GIS \(Geographic Information System\)](#), accessed 28 October 2025.

321 [Q304](#).

322 [Q311](#).

323 [Q130](#).

324 Chartered Institute of Ecology and Environmental Management, [Briefing Paper: Solution for the Planning and Infrastructure Bill](#), 15 July 2025, p.3

325 For example, the role of a Senior Planning Ecologist for Cheltenham Borough Council was advertised for in September 2021: [Senior Planning Ecologist Job Description](#). Additionally, we heard [oral evidence](#) from Sarah Postlethwaite, who is a Planning Ecologist from North Northamptonshire Council.

BNG this financial year, which can be used to employ ecologists.³²⁶ While stakeholders have welcomed this funding, some questioned whether it was enough to deliver the Government’s environmental planning policies.³²⁷ We also recognise the launch of the Growth and Skills Levy and the creation of Skills England, both of which could be used to improve the education and training of ecologists.³²⁸

- 183.** Several solutions to the ecology sector’s capacity issue were suggested to us, including the targeted recruitment and investment of ecological expertise, alongside the use of technology.³²⁹ We have heard that digital tools and artificial intelligence can assist with the resourcing challenges for ecologists by processing large volumes of data or accelerating the baseline understanding of the habitats in an area using drones.³³⁰ Considering the acute staffing challenges facing the sector, technology used in this way should be encouraged. However, there are several contexts where the use of technology cannot substitute in-person assessments, for instance during highly localised wildlife surveys.³³¹ Therefore, technology and artificial intelligence should be used as a complementary tool to aid the sector, not a substitute or replacement for ecological expertise.
- 184.** Dr Iain Boulton, Association of Local Government Ecologists (ALGE), told us that the pooling of resources is one way in which local authorities could also tackle resourcing challenges.³³² Insights from the Planning Advisory Service suggest that more joined-up and collaborative working within the sector is needed, in addition to greater resource.³³³ The Greater Manchester Ecology Unit was presented to us as an example of such collaboration, consisting of six full-time planning ecologists working across 10 local authorities, resulting in a relatively well-resourced area.^{334 335}
- 185.** Inspiration should be taken from successful training courses in other sectors. Pathways to Planning is a fully funded master’s programme designed to fast-track training in local government planning departments.

326 [Share Your Views on Biodiversity Net Gain, Plus More Funding for Local Planning Authorities](#), 3 July 2025; [Q451](#).

327 Climate Emergency UK ([ESH0011](#)); Plantlife ([ESH0070](#)).

328 Department for Education, [Prime Minister Overhauls Apprenticeships to Support Opportunity](#), 24 September 2024.

329 National Trust ([ESH0028](#)); Natural England ([ESH0058](#)).

330 [Q45](#); [Q151](#); [Q298](#); [Q339](#).

331 [Q151](#); [Q298](#); [Q339](#).

332 [Q45](#).

333 Planning Advisory Service, [Insights on Local Government Delivery of Nature Recovery](#), accessed 28 October 2025.

334 Climate Emergency UK ([ESH0011](#)).

335 Considering the severe understaffing of ecologists in local planning authorities, a relatively well-resourced area should not be confused with an area that is truly well resourced.

The course allows graduates to attend lectures while working full time in a local council planning team, whilst receiving a salary. The programme is run by the Local Government Association, in partnership with the Planning Advisory Service and MHCLG. It was launched in September 2022 and, as of November 2024, has delivered more than 80 additional planners across 60 local authorities.^{336 337} We believe that this programme could be used as a model through which the Government could provide a similar service for ecologists.

- 186.** This is a time of significant upheaval in local government due to the prospect of local government reorganisation. It is possible that the increased size of the new unitary authorities relative to the tier 2 planning authorities that currently preside over planning will lead to an opportunity to increase the workforce and professionalism of local ecology teams. The Government should not assume that will happen but should take active steps to ensure that the new authorities take the recruitment and training of ecologists seriously.

187. CONCLUSION

One of the strongest messages we have heard throughout this inquiry is that local planning authorities are severely under-resourced in terms of ecological expertise. Addressing this should be a priority, as without rapid and meaningful support, the Government will struggle to meet its house building targets while adhering to environmental standards. The Government must ensure that local planning authorities are adequately resourced in order to hire and train ecologists to execute the range of recently introduced and proposed environmental planning policies, such as Biodiversity Net Gain.

188. RECOMMENDATION

We recommend that the Government should invest in and prioritise the training and upskilling of talent in ecology as a priority. As a temporary measure, to address current staff shortages, the Government should pilot and establish local ecological resource hubs, consisting of qualified ecologists and environmental planners, who are available to local authorities facing acute resource challenges. The Government should establish a pilot programme for ecological resource hubs by July 2026.

336 Local Government Association, [Pathways to Planning](#), accessed 28 October 2025.

337 Planning Advisory Service, [PAS at 20: Navigating the Future of Planning Services, Pathways to Planning Cohort Three Open to Councils](#), 26 November 2024.

189. CONCLUSION

Qualifications in ecology may not always contain sufficient practical elements in the courses that equip future ecologists with the necessary skills for professional practice. The Committee has heard that some students may require additional training to develop the necessary competencies needed for professional roles after gaining formal qualifications such as degrees; this can add to planning delays and capacity issues in the sector.

190. RECOMMENDATION

We recommend that the Government, via Skills England, begins working with ecology qualification providers to standardise and embed essential practical components into ecology course design, by April 2026. This is to ensure that courses are geared towards modern policy demands and individuals are sufficiently equipped with the necessary skills for their professional practice. This should include training on the planning system for ecologists.

191. RECOMMENDATION

The Government should partner with professional bodies to accelerate the training of early-career ecologists through a national level, government-supported pathway, similar to that of the Pathways to Planning programme backed by the Local Government Association and MHCLG. The first iteration of this programme should be introduced by September 2027, at the very latest.

5.2 Planning

- 192.** As with ecology, planning reforms clearly cannot succeed without a robust and well-resourced planning sector. However, according to Unison, only one in five planning departments in England are fully staffed.³³⁸ MHCLG's Local Authority and Planning Capacity Skills Survey 2023 found that nine in ten planning departments have reported difficulty in hiring.³³⁹ This problem is compounded by challenges with recruiting and retaining planners, alongside a continual outflow of planning professionals from the public

338 Unison, [Housing and Growth Threatened by Council Staff Shortages](#), 16 June 2025.

339 Ministry of Housing, Communities and Local Government, [Local Authority Planning Capacity and Skills Survey 2023](#), January 2025.

sector. The Royal Town Planning Institute's State of the Profession 2023 report found that 25% of planning professionals left the public sector between 2013 and 2020.³⁴⁰

- 193.** An exodus of planners leaving the profession is concerning when greater staff capacity and resources are needed for the Government's desired planning reforms.³⁴¹ Consequently, there is concern that such under-resourcing will result in local planning authorities being vulnerable to speculative development and poor outcomes.³⁴² For instance, Professor Alistair Scott, Professor of Environmental Geography and Planning at Northumbria University, told us that planners needed to be involved in developing a site in order to ensure all critical infrastructure, including green infrastructure, are present and that sites had "the right houses in the right places".³⁴³ Our evidence suggests a substantial gap between government ambition and the realities of workforce capacity.

Ecological Expertise Within the Planning Profession

- 194.** Our evidence also points to a lack of ecological knowledge within the planning sector. This gap in expertise matters because it weakens the ability of planning officers to ascertain whether ecological measures in developments are appropriate and have been properly implemented and maintained. The campaign group Wild Justice argued that this knowledge gap is compounded by the fact that ecology related matters are often deemed to be low priority and staff do not have capacity to handle anything other than the most serious planning offences.³⁴⁴
- 195.** Sue Searle, Managing Director and Principal Ecologist of Ecology Training UK, informed us that her organisation had trained a lot of planners who did "not have any skills in ecology".³⁴⁵ Marian Spain, Chief Executive of NE, also told us that levels of ecological understanding in local authorities was a challenge for NE. Though planning officers did not need a deep level of ecological understanding, NE required "intelligent customers" who are able to understand the advice given to them by NE staff to make sound

340 LocalGov, [Leveraging Data to Reverse the Planning Staff Decline](#), 22 April 2024; Royal Town Planning Institute, [State of the Profession 2023 | Championing the Power of Planning](#), 28 October 2025; Climate Emergency UK ([ESH0011](#)); [Q129](#).

341 Council for British Archaeology (CBA) and the Chartered Institute for Archaeologists ([ESH0018](#)).

342 The Council for British Archaeology and the Chartered Institute for Archaeologists ([ESH0018](#)); UK100 ([ESH0046](#)).

343 Oral evidence taken on 20 November, [Q4](#) [Alistair Scott].

344 Wild Justice, [Lost Nature: Are Housing Developers Delivering Their Ecological Commitments?](#), 12 December 2024, p.47.

345 Sue Searle ([ESH0095](#)); [Q303](#).

judgements.³⁴⁶ That many do not is concerning because NE and local planning authorities work closely together, and if local authorities are unable to fully understand or implement advice from NE, they will struggle to carry out their statutory duties.

- 196.** The importance of ecological awareness amongst planners was exemplified during our visit to Nansledan in Cornwall. We heard how a lack of understanding of local ecological conditions can lead to poor outcomes; for example, planting urban trees in unsuitable locations or selecting species that poorly adapt to local conditions, leading to premature death. This underlined the necessity of appropriate ecological expertise alongside a cross-disciplinary team who understand the implicit importance of ecology for a development.
- 197.** We also heard that climate and carbon literacy amongst built environment professionals needs to improve. For example, Charlotte Neal, Director of Surveying Practice, Royal Institute of Chartered Surveyors (RICS), told us that there is a need for more carbon literate building surveyors to help reduce embodied carbon in buildings.³⁴⁷

Planning and Ecological Education

- 198.** These broad-based knowledge gaps in the planning sector reflect gaps in professional education and training. For instance, Dr Howard from the Institute of Sustainability and Environmental Professionals (ISEP),³⁴⁸ told us that he had offered training to planning graduates who during their degree had never heard of Environmental Impact Assessments; “a damning indictment of the lack of read-across between planning degrees and the environmental legislation that accompanies planning”.³⁴⁹ He insisted that planners should have a basic level of ecological and climate literacy, just as ecologists should be familiar with planning, as Marian Spain argued.^{350 351}
- 199.** There is a clear need to increase the overlap in skills and expertise between the planning and ecology sectors, to better inform decisions as to where housing and nature should be placed and to speed up the housebuilding process. While modules covering climate change, environmental policy and law already exist on many university planning courses, we believe there is a gap in the curriculum when it comes to ecology.³⁵² We acknowledge pre-

346 [Q396](#).

347 [Q131](#).

348 ISEP was formally known as Institute of Environmental Management and Assessment (IEMA).

349 [Q336](#).

350 [Q336](#).

351 [Q322](#).

352 Sarah Postlethwaite ([ESH0087](#)).

existing efforts by organisations such as the Town and Country Planning Association and the Royal Town Planning Institute to provide continuous professional development courses on environmental issues.³⁵³ However, such short courses can only provide a brief overview of ecological issues and are unable to impart any level of detailed knowledge or understanding of ecology, and relevant policies such as BNG.³⁵⁴

- 200.** Addressing the ecological and environmental knowledge gap within local authority planning departments must begin with investment. The House of Lords Built Environment Committee noted, in 2023, that the funding shortfall for local planning authorities “risks poorer outcomes for the environment owing to an inability of decision makers to apply environmental regulations and provide advice”.³⁵⁵ Our evidence suggests that this continues to be the case. There needs to be greater commitment to, and increased investment in, ecological and environmental training courses for new and already qualified planning professionals. NE described investment in skills and capacity in local planning authorities to support the implementation of environmental policies as “one of the most critical elements” of planning reform.³⁵⁶
- 201.** We acknowledge and welcome the Government’s two-year grant of £4.5 million, from September 2025, for new planning roles in local councils, and the target to recruit 300 local planners by the end of 2026.³⁵⁷ Yet there is concern that this will not be sufficient to remedy the lack of public sector planners in the system, due to the continual brain drain to the private sector, combined with estimates that the target will, in reality, only result in one new planner per local authority and consequently do little to address the capacity challenges of the sector.³⁵⁸ We therefore believe that the Government should give further consideration to how it will further address these staff shortages and knowledge gaps within the public planning system.

353 Town and Country Planning Association, [Training Offer](#), accessed 15 October 2025; Royal Town Planning Institute, [Climate Change and Environmental Planning | Championing the Power of Planning](#), accessed 15 October 2025; Town and Country Planning Association and the Royal Town Planning Institute, [The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change](#), January 2023.

354 Sarah Postlethwaite (ESH0087).

355 House of Lords Built Environment Committee, Second Report of Session 2022–23, [The Impact of Environmental Regulations on Development](#), HL Paper 254, para 126.

356 Natural England (ESH0058), para 6.5.

357 Ministry of Housing, Communities and Local Government, [Planning Overhaul to Speed Up and Simplify Local Plans](#), 27 February 2025.

358 Daniel Scharf MRTPI (ESH0006); Climate Emergency UK (ESH0011); Friends of the Earth England, Wales and Northern Ireland (ESH0066); The Planner, [How Realistic is Labour’s Plan to Recruit 300 New Planners?](#), 25 July 2024.

202. CONCLUSION

The shortage of planning professionals in local authorities is undermining the planning system's ability to function effectively. Planning officers are unable to thoroughly consider applications within statutory timeframes and are unable to adequately pre-consult. This capacity gap compromises the quality, transparency and timeliness of planning decisions. This is problematic, as Natural England has gaps in its own expertise and relies on knowledge from local authorities.

203. CONCLUSION

Planning qualifications do not adequately equip professionals with sufficient levels of carbon literacy or ecological knowledge. This undermines planning officers' ability to fully consider environmental factors in their decision making. To ensure that climate resilience, carbon emissions and ecology are fully incorporated into planning decisions, training on climate change and ecology must be incorporated as core components in planning qualifications and training courses.

204. RECOMMENDATION

Planning qualifications and accreditation should include mandatory training in ecology and carbon literacy, to ensure that planning professionals have adequate knowledge of nature and climate issues to address these challenges in the built environment. We recommend that the Government, via Skills England, works with a relevant body, such as the Royal Town Planning Institute to:

- a.** Develop mandatory training in ecology and the decarbonisation of buildings for those working towards Chartered Town Planner status.
- b.** Review current planning qualifications to ensure they adequately test knowledge of ecology and carbon literacy.

205. As we referred to earlier (para 182) with regard to ecologists, it is possible that the increased size of the new unitary authorities relative to the tier 2 planning authorities that currently preside over planning will lead to an opportunity to increase the workforce and professionalism of local planning teams. The Government should not assume that will happen but should take active steps to ensure that the new authorities take the recruitment and training of planners seriously.

206. RECOMMENDATION

In addition, we recommend that the Government works with the Planning Advisory Service to develop suitable continuous professional development modules in ecology, carbon literacy and climate change, for qualified planning professionals and support their delivery through local authorities. These should be in place by September 2026.

5.3 Construction Skills

Workforce Capacity and Skills

- 207.** There have been several reports questioning whether the UK’s construction sector has the necessary skills to deliver the Government’s pledge to deliver 1.5 million homes and meet its climate and environment targets. In July 2025, a City and Guilds survey found that 76% of construction firms were struggling to recruit the skilled workers they needed, with 84% of respondents believing that the industry is facing a critical skills crisis. Over half (54%) expressed doubt that the sector could meet the Government’s housing or net zero targets.³⁵⁹ Commissioned research from the Cambridge Centre for Housing and Planning Research reported that “the UK construction industry is facing a severe skills shortage, with over 140,000 job vacancies stalling essential housing and infrastructure projects”.^{360 361} It highlighted an increasing need for new and enhanced skills to accommodate for changes in construction practices, ranging from offsite methods to digital technologies and new amenities, such as heat pumps.³⁶²
- 208.** Other evidence has pointed to specific skills that will be required if homes are to be built with more sustainable materials, such as those discussed in the previous chapter. For instance, Dr Ruth Lang, writing in April 2024, stated that:

“Carbon-intensive materials such as concrete and steel are familiar in application requirements, and readily available for purchase (thereby reducing lead-in times), and there is a lack of contractors with the skills and proven experience to use low-carbon construction methods such as new bio-based material products. As a result, a low-carbon

359 City and Guilds, [Foundations for the Future: Building the Skills to Deliver 1.5 Million Homes](#), 3 July 2025.

360 The research was commissioned by Places for People: [A Network of Companies, Creating Happy, Inclusive and Sustainable Communities](#), accessed 27 October 2025.

361 [The Cambridge Centre for Housing and Planning Research](#) is based at Cambridge University and researches housing supply, affordability, tenure, homelessness, innovations in construction and other housing and planning issues.

362 Cambridge Centre for Housing and Planning Research, [Construction and Building Trades: The Skills Horizon](#), July 2025, p 17 & 21.

construction strategy using these materials is perceived as a riskier approach. This is hindering contractors' confidence in employing carbon reduction strategies in their schemes, due to their uncertainty in being able to deliver on these aims.³⁶³

- 209.** It should be noted that some of these skills gaps are long-standing. In 2019, the House of Commons Housing, Communities and Local Government Committee's report on Modern Methods of Construction (MMC) found that there was a need to ensure that skills programmes, apprenticeship schemes and the new T-levels give learners the skills they need to carry out both traditional building techniques and MMC.^{364 365}

Government Policies to Expand the Construction Workforce

- 210.** The Government has recognised the need to expand the construction workforce if it is to build 1.5 million homes this Parliament. This ambition is expected to compete with other priorities, including major infrastructure projects and housing-related targets such as retrofitting and the pledge to upgrade five million homes over five years.³⁶⁶ Recent estimates from the Construction Industry Training Board state that the UK will need to recruit 239,300 extra workers 2025–29 to deliver on the Government's construction commitments.³⁶⁷
- 211.** In March 2025, the Construction Skills Mission Board was established by the Construction Leadership Council to support the Government's commitment to invest an additional £625 million in construction skills and to recruit

363 Dr Ruth Lang, [Low-Carbon Homes: Housing Construction for the Green Transition](#), April 2024, p 21.

364 Modern methods of construction, or MMC, is a collective term for building methods that are designed to be more efficient and effective than the traditional 'brick and block' method of constructing buildings, including residential buildings such as houses and blocks of flats. Such building methods range from factory-produced structures that are built entirely offsite, to modular components that enable structures to be assembled more quickly or easily onsite, and other building techniques that increase productivity on construction sites. See House of Lords Library, [In Focus: Modern Methods of Construction in the Housing Industry](#), August 2024, which offers an overview of previous attempts to drive MMC.

365 Housing, Communities and Local Government Committee, Fifteenth Report of Session 2017–19, [Modern Methods of Construction](#), HC 1831, July 2019; Housing, Communities and Local Government Committee, [Government Must Embrace Modern Methods of Construction or Risk Missing 300,000 Homebuilding Target](#), 3 July 2019.

366 Department for Education, [Skills England: Sector Skills Needs Assessments Construction](#), June 2025, p. 3.

367 Construction Industry Training Board, [Construction Workforce Outlook: Labour Market Intelligence Report 2025–2029](#), accessed 27 October 2025. Referenced in: Department for Education, [Skills England: Sector skills Needs Assessments Construction](#), June 2025, p 3.

another 60,000 construction workers.^{368 369} As part of its approach, the Government is introducing funding for new Technical Excellence Colleges, Skills Bootcamps, and foundation apprenticeships. In June 2025, it committed £100 million to support more than 40,000 industry placements, alongside a £32 million contribution from the Construction Industry Training Board.³⁷⁰ The Government also stated that it was delivering “major reforms to transform job centres to tackle skills shortages in the construction sector”.³⁷¹

Construction Skills to Deliver Sustainable Housing

- 212.** Written evidence pointed to a lack of construction skills as a barrier to delivering housing targets, with the size of the deficit being an area of concern. We heard one estimate that 251,500 people will be required, by 2028, to meet new the demand for construction and to backfill those leaving the sector.³⁷²
- 213.** It is important to note that “construction skills” is a broad term that encompasses a wide range of competencies, many of which face specific skills gaps. This includes expertise to redevelop brownfield sites, digital skills, and skills to retrofit older homes using new technologies and sustainable materials to reduce embodied and operational carbon.³⁷³ The UK Green Building Council views the Government’s housing and

368 The [Construction Leadership Council](#) works with industry, clients and Government to develop an industry that has the capability, capacity and resilience to: support the industry to respond to the current economic challenges; drive growth and investment; promote the industry; improve productivity through digital adoption, industrialisation and innovation; successfully manage the sector’s transition to Net Zero; and, create improved societal outcomes.

369 Construction Leadership Council, [Construction Launches Skills Mission at Leaders Meeting](#), 26 June 2025.

370 The Department for Work and Pensions, the Ministry of Housing, Communities and Local Government, the Department for Business and Trade and the Department for Energy Security and Net Zero, [Thousands More to Get the Tools They Need to Start Construction Careers](#), 26 June 2025.

371 The Department for Work and Pensions, the Ministry of Housing, Communities and Local Government, the Department for Business and Trade and the Department for Energy Security and Net Zero, [Thousands More to Get the Tools They Need to Start Construction Careers](#), 26 June 2025.

372 Dr Renukappa, Mr Stride, and Professor Subashini Suresh ([ESH0020](#)); Town & Country Planning Association ([ESH0061](#)). See also: National Trust ([ESH0028](#)) and Friends of the Earth England, Wales and Northern Ireland ([ESH0066](#)).

373 Dr Renukappa, Mr Stride, and Professor Subashini Suresh ([ESH0020](#)); Environmental Building Research Group, University of Plymouth ([ESH0067](#)); Wildlife and Countryside Link ([ESH0081](#)). The latter pointed to insulation measures, heat pumps, solar and batteries.

environmental and climate change targets as a “huge opportunity” to create skilled, quality jobs in every part of the country and for the sustainable built environment sector”.³⁷⁴

214. These points were made by Brian Berry, CEO of the Federation of Master Builders (FMB). He told us that there was a “serious shortage of workers to carry out the housing and infrastructure projects that are needed”.³⁷⁵ He noted that, from the FMB’s own surveys, 37% of his members were struggling to recruit carpenters, 28% were struggling to recruit bricklayers, and 21% plasterers, with the number of apprenticeships—about 37,000 over the previous year—not keeping pace to meet the growing demand.³⁷⁶ He also noted an increasing need for specific skills, such as digital and retrofitting, especially amongst SME builders, to reduce embodied carbon and make homes more energy efficient.³⁷⁷ He welcomed the Government investing £600 million in construction and noted that the Construction Leadership Council had set up a mission board to look at how more people could be trained to deliver 1.5 million new homes.³⁷⁸ However, he was concerned that it would take time for this to filter through and as to whether this delivered the long-term skills needed.³⁷⁹

215. We asked the Minister for Housing and Planning, Matthew Pennycook, about our concerns as to whether the construction industry had the skills to deliver its housing targets while meeting its environmental and climate change targets. He told us that

“On the construction side, we have a new construction skills mission board, which will oversee an industry-led plan to recruit an additional 100,000 construction workers a year by the end of this Parliament. You will know that, at the spring statement, the Chancellor committed £625 million for construction skills to recruit an additional 60,000 construction workers by 2029. There are other industry interventions in this space; for example, there was a £140 million industry investment last year to set up 32 pioneering home-building skills hubs. There is lots of work, and that is a real cross-government effort, incorporating DWP and DfE—all the Departments with some responsibility for skills. You will also know that, overall, the spending review provided an additional £1.2 billion a year for the skills system by 2029”.³⁸⁰

374 The UK Green Building Council ([ESH0064](#))

375 [Q301](#).

376 [Q300](#).

377 [Qq323–329](#).

378 [Q332](#).

379 [Q305](#) and [Q332](#).

380 [Q448](#).

216. CONCLUSION

We have heard concerns that the construction industry does not have the numbers, nor the skills, needed to deliver the volume or types of homes that will enable the Government to meet its targets for housing, the environment, nature and net zero. We welcome the Government's acknowledgment of this, along with its investment and policies to expand the construction workforce by 100,000 and equip it with the skills needed to deliver on its ambitious plans.

217. CONCLUSION

However, we are yet to be convinced that this alone will be enough. As the Government itself has acknowledged, the construction sector will be instrumental in meeting wider Government commitments. Recruiting new talent is essential but training takes time and, in the interim, the existing workforce is already overstretched but expected to increase output. We are concerned as to whether the Government has adequately demonstrated that the existing and future construction workforce will have the full range of skills needed to meet housing and environment targets. These skills include the ability to work with new materials, install a range of technologies, maximise the productivity of brownfield sites, use the latest digital tools, and have the knowledge and skills to interact with planning professionals and ecologists.

218. RECOMMENDATION

We recommend that the Government, in response to this report, should:

- Provide a realistic assessment of the construction workforce and what is needed to deliver the Government's housing targets for each remaining year of this Parliament. This should include:
 - Annual estimates of the number of construction workers needed to meet the Government's yearly and five-year home building targets.
 - The projected natural wastage (i.e. rates of retirement) for each year from the existing workforce, to establish a baseline for recruitment and anticipate the impacts on home building.
 - Projections as to how many new recruits are expected to join the construction workforce, after adequate training that focusses on building residential properties.
 - Possible contingencies, for each year, if existing and projected workforce levels are insufficient to deliver annual housing targets.

- Set out an analysis of the skill set the Government believes will be required to deliver 1.5 million homes, in line with climate and biodiversity targets. This should include an analysis of any significant gaps and how they will be addressed, in addition to:
 - Skills required to install sustainable building materials.
 - Digital skills and tools to improve efficiency and support the measurement and reduction of embodied and operational carbon.
 - Skills and knowledge to maximise the development of brownfield sites for housing.
 - Skills needed to retrofit existing housing stock, to meet environmental and net zero standards.
 - An ability to work with ecologists and planning professionals to ensure optimum environmental and nature-based outcomes and support key policies such as Biodiversity Net Gain.

5.4 Natural England

- 219.** As the government body responsible for protecting and enhancing the natural environment, Natural England (NE) is central to implementing planning reforms. However, as with the planning and ecology sector, the arms-length body does not possess the resources required to satisfactorily fulfil its statutory duties in environmental protection and planning. Concern about NE resourcing has been a longstanding issue, with the organisation being described as being at “crisis point” in 2019.³⁸¹ In 2020, the Chair of NE, Tony Juniper, expressed concern about NE’s budget relative to the tasks it is expected to complete.³⁸² While in 2023, the House of Lords Built Environment Committee concluded that “public bodies are facing challenges recruiting and retaining ecological expertise” and recommended that gaps in expertise within Natural England (and the Environment Agency) should be assessed and filled.³⁸³

381 Farming UK, [Natural England is ‘Undervalued and Underfunded’ and Faces ‘Crisis Point’](#), 30 January 2019.

382 Environmental Audit Committee, [Natural England Finances Squeezed by Government Making Biodiversity Protection Challenging](#), 13 November 2020.

383 House of Lords Built Environment Committee, Second Report of Session 2022–23, [The Impact of Environmental Regulations on Development](#), HL Paper 254, para 30 & 31.

- 220.** Our evidence has shown us that these longstanding concerns about NE’s capacity persist. Kenny Duncan, representing developer Crest Nicholson, informed us that NE continues to struggle with responding to planning applications within statutory timeframes, primarily because of insufficient resourcing.^{384 385} Similarly, Dr. Rufus Howard, of the Institute of Sustainability and Environmental Professionals (ISEP),³⁸⁶ and Sue Searle from Ecology Training UK, explained to us that it has become harder to directly engage with NE’s staff over the past two decades as online guidance has replaced personal consultation.³⁸⁷ Ms Searle explained that this trend heightens the risk of incorrect decision-making and planning delays.³⁸⁸
- 221.** The Minister for Nature, Mary Creagh MP, said that NE is moving towards more automated responses, rather than fewer, because “not everything has to have a person behind it”. She told us that she hopes this will reduce the volumes of casework in arms-length bodies and speed up services for those requiring bespoke advice.³⁸⁹
- 222.** Earlier this year it was reported that NE is planning to cut approximately 200 jobs, later corroborated by Natural England’s Action Plan for 2025/26.³⁹⁰ The latter explained that the organisation had, at the time of writing, 2,656 full time equivalent (FTE) employees, but wanted to reduce this number (by 172) to 2,484 FTE, by March 2026. To achieve this, NE is running a voluntary exit scheme.³⁹¹
- 223.** Reports of staff cuts coincided with growing responsibilities for the agency, raising concerns across industry.^{392 393} Marian Spain, Chief Executive of NE, assured us that the organisation has the skills and workforce needed to meet new responsibilities, such as EDPs, and explained that NE is already transferring and retraining staff in order to begin work on more “strategic solutions”.³⁹⁴ When pressed, however, Ms Spain acknowledged that NE

384 [Qq245-246](#).

385 However, we accept that insufficient resourcing may not be the only reason for delays in responding to planning applications, for example: Department for Environment, Food and Rural Affairs, [Conservation of Habitats and Species Regulations and Conservation of Offshore Marine Habitats and Species Regulations 2017](#), July 2025, p.12.

386 ISEP was formally known as IEMA - the Institute of Environmental Management and Assessment.

387 [Qq306-308](#).

388 [Qq306-308](#).

389 [Q452](#).

390 The i Paper, [Hundreds of Jobs Protecting Rivers and Green Belt To Be Axed](#), 20 March 2025.

391 Natural England, [Natural England Action Plan](#), June 2025 p.24.

392 UK Government, [Hundreds Of Quangos To Be Examined For Potential Closure As Government Takes Back Control](#), 7 April 2025.

393 The National, [Natural England Boss Reveals Concern Over Budget For Nature Restoration](#), 30 May 2025.

394 [Q395](#).

may need to rely on partners, such as local planning authorities and environmental organisations, to fully deliver its objectives.³⁹⁵ Yet NE’s own written evidence identifies staff funding and recruitment in local planning authorities as a barrier to nature recovery.³⁹⁶ This raises a critical question: Where will the necessary staff resource come from, if NE intends to rely on local planning authorities that it recognises as under-resourced? Moreover, NE itself has adopted some responsibilities that should fall to local government because of the latter’s resourcing gaps.³⁹⁷

- 224.** The Government has recognised that statutory consultees like NE require sufficient resourcing in order to carry out their duties. The Housing and Planning Minister, Matthew Pennycook MP, has stated that the Government will develop a sustainable approach to funding to enable this to happen.³⁹⁸ The PIB introduces a new funding model for the statutory consultee system, which intends to allow the Secretary of State to apply a surcharge to planning application fees in order to cover the costs of statutory consultees engaging in the planning process.³⁹⁹ We also note the Government’s various initiatives to address skills shortages across the sector in general, for instance by the creation of Skills England, alongside the growth and skills levy.⁴⁰⁰
- 225.** Despite government assurances that NE’s funding will be reformed and new policies introduced, longstanding resourcing issues at NE persist and will take time to resolve. We have heard evidence to suggest that staff from NE and local authorities—including planners and ecologists—are stretched to their limits. Collaboration between NE, planning professionals and ecologists is essential but needs to be underpinned by a coherent strategy for resourcing. The evidence we have heard has led us to believe that the skills and resources needed to deliver the ecological aspects of the Government’s planning reforms simply does not exist at the scale, quality or capacity that is needed.

395 [Q395](#).

396 Natural England ([ESH0058](#)), para 8.9.

397 [Q306](#).

398 [Reform of the Statutory Consultee System](#), HCWS510, 10 March 2025.

399 House of Commons Library, [Planning and Infrastructure Bill 2024–25: Progress of the Bill](#), Research Briefing CBP 10277, 5 June 2025, p.5 & 27.

400 Department for Education and the Prime Minister’s Office, [Press Release: Prime Minister Overhauls Apprenticeships to Support Opportunity](#), 24 September 2024.

226. CONCLUSION

If the environmental objectives of the Government are to be achieved, it is vital that Natural England (NE) is adequately resourced. However, NE does not currently have the necessary resources to deliver the Government's expectations of it. Its reliance on partners, such as local authorities, is concerning considering they are also subject to severe under-resourcing.

227. RECOMMENDATION

The Government should publish a paper, by March 2026, clearly laying out the Government's housing targets, NE's role as a statutory consultee and in developing and implementing the NRF, and what resourcing will be required for NE going forwards to deliver this. This paper should include details as to how NE will operate in light of staffing cuts and the additional responsibilities that it will be given when the current Planning and Infrastructure Bill is enacted.

Conclusions and recommendations

Policy and Governance

1. The Government has assured us that section 19 of the Environment Act 2021, which requires Ministers to give full consideration to the Environmental Principles Policy Statement (EPPS) when making policy, was complied with during the drafting of the latest revision of the National Planning Policy Framework (NPPF) and creation of the Planning and Infrastructure Bill (PIB). Due to the strong public interest in the Government's planning reforms, it is our view that it is imperative that they publish their considerations as to how the NPPF and PIB comply with the Government's own Environmental Principles Policy Statement (EPPS). (Conclusion, Paragraph 22)
2. The Government should set out how the NPPF and PIB comply with the EPPS, in line with sections 17 and 19 of the Environment Act 2021. Two complete and separate statements should be shared with the Committee—one for the NPPF and one for the PIB—in response to this report. (Recommendation, Paragraph 23)
3. Improved data sharing is a fundamental enabler of efficient and effective cross-organisational work to deliver sustainable housing. While there is evidence of cross-departmental working between DEFRA and MHCLG on planning, nature and housebuilding, the evidence we have taken suggests that existing data platforms are still siloed within organisations. This inhibits the sharing of geospatial and ecological data which could improve decision making relating to environmental and housing building targets. The sharing of environmental and land use data is a key enabler for improving cross-departmental collaboration, supporting decision-making, increasing overall efficiency and allowing government departments, local planning authorities, and arms-length bodies to collaborate on individual cases, within a single, unified case working system. (Conclusion, Paragraph 31)
4. Within 12 months of this report, the Government should establish a shared geospatial and environmental data platform, integrated with a case working system. This should be designed for use across government departments, arms-length bodies and local planning authorities to aid decision-making and collaboration. It should be maintained by a cross-

departmental team. We note that mechanisms to consolidate and share data—such as the National Land Data Framework and MAGIC (Multi-Agency Geographic Information for the Countryside)—are in development. We recommend accelerating this into a fully operational data sharing platform. This would facilitate cross-government working on nature, planning and housebuilding decisions. (Recommendation, Paragraph 32)

5. We have heard strong and repeated concerns that the environment could be sidelined in the presumption for sustainable development, and that the current revision of the National Planning Policy Framework (NPPF) could result in unsustainable and speculative development. The evidence we received suggests that the presumption in favour of sustainable development, as currently framed, prioritises economic growth over environmental protection, leading to outcomes that are inconsistent with the long-term goals of sustainability and the NPPF's goal of sustainable development. (Conclusion, Paragraph 43)
6. We recommend that the Government do more to ensure that local planning authorities are able to, and do, produce up to date local plans, to ensure that developments are being assessed by appropriate local policies, rather than being subject to the presumption in favour of sustainable development. (Recommendation, Paragraph 44)
7. We recommend that the Government should amend the definition of the presumption in favour of 'sustainable development' in the December 2024 revision of the NPPF to give greater weight to environmental sustainability. This should include strengthening safeguards against environmentally unsustainable, unplanned and speculative development. These revised definitions should be provided to the Committee in the Government's response to this report. (Recommendation, Paragraph 45)
8. Stakeholders highlighted the importance of alignment between a national Land Use Framework, environmental policies and planning policies. Such alignment will help direct housing developments and nature conservation or restoration to appropriate locations. It will also help reduce confusion, avoid conflicting objectives, and support coherent decision-making and streamlined delivery. Crucially, it will provide clarity surrounding the application of planning rules and help prevent spurious challenges. In doing so, this supports the Government to achieve its goal of streamlining the planning system, resulting in more positive planning outcomes whilst offering clarity to all stakeholders as to what sustainable development really looks like. (Conclusion, Paragraph 57)
9. Any future national spatial planning or land use policies, such as a Land Use Framework or Spatial Development Strategies, must be aligned with, and complimentary to, all environmental targets, frameworks and policies. These include but are not limited to: Environment Act 2021

targets, the Environmental Improvement Plan, Biodiversity Net Gain, Nature Recovery Networks, Environmental Land Management Schemes, Local Nature Recovery Strategies (LNRS), Environmental Delivery Plans (if in existence) and Flood Plans. The relationships between LNRS and other spatial planning and nature policies, such as the ones noted above, should be made clear. In its response to this report, Government should lay out how each of the policies mentioned above align and work together. (Recommendation, Paragraph 58)

10. Local authorities must ensure they have up to date local plans and environmental and climate planning policies. When combined, all local plans and policies should satisfy national environmental targets, allowing for flexibility as to how they meet these targets between areas, in reflection of unique and local environmental characteristics. The Ministry of Housing, Communities and Local Government, and the Department for Environment, Food and Rural Affairs, should work together to audit all local plans once produced to ensure that, collectively, they add up to meet national house building and biodiversity targets. (Recommendation, Paragraph 59)
11. We recommend that the Government should explicitly incorporate matters relating to biodiversity into the Duty to Co-operate, enabling local planning authorities to work together to meet national house building and biodiversity targets at a regional level. The Duty to Co-operate on biodiversity should eventually be integrated into Sustainable Development Strategies and be required to align with Local Nature Recovery Strategies. (Recommendation, Paragraph 60)
12. As our recent report on flood resilience stated, the planning system fails to account for the cumulative and cross-boundary impacts of development on flood risk. Land use decisions are often made in isolation, without considering downstream consequences, catchment-scale dynamics, or long-term resilience. This fragmented approach undermines catchment-based and natural flood management, can lead to new development in floodplains, increases exposure for vulnerable communities, and represents a critical weakness in national flood strategy. (Conclusion, Paragraph 61)
13. We reiterate that the Government should ensure that flood and climate resilience are embedded into the core tools of planning, regulation, and investment appraisal. The NPPF should be strengthened to prioritise flooding avoidance and climate adaptation, mandating sustainable drainage systems and consider the need for property flood resilience measures in all new developments through building regulations. As stated in our recent report on flood resilience, the Government should initiate a consultation on statutory requirements for assessing the cumulative impact of development on flood risk within local and regional plans by the end of 2025. (Recommendation, Paragraph 62)

Environmental Protection

14. We acknowledge and welcome the Government's amendments in June 2025 to Part 3 of the Planning and Infrastructure Bill. Akin to the OEP, we see the potential benefits of moving towards a more strategic approach to nature recovery. The amendments are a promising step towards ensuring that the proposed strategic approach of Environmental Delivery Plans and the Nature Restoration Fund do not result in the reduction of any environmental protections, risking irrevocable harm to our national ecosystems. Nevertheless, the new approach to meeting existing environmental requirements, introduced in Part 3 of the Planning and Infrastructure Bill, is not enough on its own to ensure that the Government can meet its environmental targets alongside its housing target. Beyond the Planning and Infrastructure Bill, the Government must actively employ the full breadth of policy levers at its disposal to improve the natural environment. (Conclusion, Paragraph 77)
15. The Government must not veer down the path of viewing nature as an inconvenience or blocker to housebuilding. In most cases housing delivery is delayed or challenged due to unclear and conflicting policies, land banking and skills shortages. Using nature as a scapegoat means that the Government will be less effective at tackling some of the genuine challenges facing the planning system. At worst, this approach could lead to the degradation of the natural world, preventing the achievement of legally-binding climate and nature targets, upon which our society and economy depends. (Conclusion, Paragraph 78)
16. We are concerned about the levels of subjectivity that may arise if the Secretary of State for the Environment acts as the sole and final arbiter of whether an Environmental Delivery Plan satisfies the overall improvement test. (Conclusion, Paragraph 79)
17. In the interest of transparency, in response to this report, MHCLG and DEFRA should publish the criteria the Secretary of State will use to determine whether an EDP has passed the overall improvement test or not. It should also set out mechanisms as to how decisions made by the Secretary of State could be scrutinised and held accountable. (Recommendation, Paragraph 80)
18. Considering the conflicting roles Natural England (NE) are expected to play in developing, delivering and assessing Environmental Delivery Plans (EDPs) and the Nature Restoration Fund, we are concerned about the potential for either a real, or a perception of, a conflict of interest. We do not doubt the earnestness and expertise with which NE staff will seek to deliver EDPs,

but nevertheless it is essential that robust safeguards are in place to ensure transparency and accountability throughout the regulatory process. (Conclusion, Paragraph 84)

- 19.** Natural England should publish a clear statement outlining how it will protect against conflicts of interest arising when developing, implementing and assessing Environmental Delivery Plans and the Nature Restoration Fund in response to this report. (Recommendation, Paragraph 85)
- 20.** The Government and NE should regularly assess whether the implementation of the EDP policy is reducing public confidence in NE and consider how they can, from the outset, build confidence in NEs ability to be both producer and arbiter of EDPs. (Recommendation, Paragraph 86)
- 21.** We accept that the initial impact assessment of the Nature Restoration Fund (NRF) was carried out on the basis of nutrient neutrality, due to limitations with broader data availability. However, as the NRF will have considerable implications for a wide range of environmental issues aside from nutrient pollution, a unidimensional impact assessment is not satisfactory. We welcome the reassurances from the Minister for Housing and Planning that the NRF will not reduce the existing protections of habitats and species. However, this does not provide a satisfactory substitute for a full and independent analysis of the impacts the NRF will have if applied to other habitats and species, which have vastly differing characteristics and management techniques. We believe it unwise to impose a policy solution on a problem that has not been fully accounted for. (Conclusion, Paragraph 89)
- 22.** The Government should revise the impact assessment for the NRF, to take account of a variety of environmental issues, not only nutrient neutrality. It should consider the impact, role and budget of local authorities during the revision process. Only once a fully comprehensive impact assessment of the environmental aspect of the NRF has been completed can informed decisions about the efficacy of the NRF be made. The Government and Natural England must be clearer as to how approaches to the NRF will differ depending upon the environmental issue at hand. If this is not possible, then the NRF should only be applied to nutrient pollution, as we cannot be sure of the impact it will have on the environment otherwise. (Recommendation, Paragraph 90)
- 23.** Given the weak impact assessment of the NRF, we ask the Government to prepare a regulatory assessment of the NRF, if and when it is adopted. This assessment should be completed before Part 3 of the Planning and Infrastructure Bill (PIB) is brought into force and should set out details of how it is to be implemented, such as timelines and actions to be taken by relevant stakeholders. We encourage the OEP to monitor and regularly report on the implementation of the PIB once in statute, including on

how successful it is at safeguarding protected habitats and species, the application of the overall improvement test, compliance with the EPPS Duty and the non-regression statement on the face of the Bill. (Recommendation, Paragraph 91)

- 24.** The relaxation of the mitigation hierarchy (MH) in the Planning and Infrastructure Bill has been a significant point of contention. The MH aims to ensure that harm to nature is first avoided, with destruction and compensation used only as a last resort. We believe that the strict application of the MH on housing developments should remain in place, unless it is proven, using the best available scientific evidence, that nature is better served by not adopting the hierarchy in specific and individual instances. (Conclusion, Paragraph 97)
- 25.** Whilst accepting the Minister and NE's assurance that the MH has remained in place, and would only be set aside where doing so would demonstrably benefit nature, we urge the Government and NE to publish site-specific evidence of the environmental improvements in all occasions where the MH has not been applied. This transparency is necessary to build confidence that nature a) has not been depleted and b) that it is benefitting from this alternative approach. (Recommendation, Paragraph 98)
- 26.** We recommend that this evidence should include the systematic monitoring and review of the environmental outcomes on all sites where an EDP has been approved and introduced. NE should publish annual reports detailing the extent to which the MH has been applied to developments with an EDP, alongside evaluations of the effectiveness of the decisions made to improve the environment. (Recommendation, Paragraph 99)
- 27.** It is too early to assess the overall success of Biodiversity Net Gain (BNG), as the policy is still establishing itself. Its long-term success is dependent upon the establishment of clear and effective regulation. The absence of standardised monitoring and enforcement protocols, clear lines of accountability, and insufficient resourcing, undermines confidence in the policy. Without strengthened oversight and consistent implementation across the country, BNG risks falling short of reaching its full potential. (Conclusion, Paragraph 111)
- 28.** More clarity is needed on how off-site Biodiversity Net Gain (BNG) projects will be maintained, monitored, and enforced over the full 30-year period. We ask the Government, in response to this report, to lay out clearly who is responsible for oversight and enforcement of BNG throughout its lifespan, and how monitoring and enforcement is standardised across Local Planning Authorities to ensure consistent delivery. (Recommendation, Paragraph 112)

29. We are concerned there is a risk that implementing Biodiversity Net Gain (BNG) on housing developments may inadvertently result in unreasonable fees for residents or more expensive housing, which runs counter to the Government's aim of creating more affordable housing. Communities of all socio-economic backgrounds should be able to afford to live in developments benefitting from onsite BNG. (Conclusion, Paragraph 113)
30. The Government should set out how it plans to control the long-term costs and implementation of on-site BNG initiatives, so they are delivered to sufficient standards and ensure unreasonable costs are not passed onto households; as part of this, the Government should consider the implications of third-party delivery models. In addition, the Government should explain to us what it is already doing to prevent residents from being overcharged for BNG services in its response. (Recommendation, Paragraph 114)
31. Introducing new exemptions to BNG when the policy remains in the early stages of implementation may have unintended consequences, particularly if applied too broadly. We believe more time is needed to assess the effectiveness of BNG before substantive changes are made. (Conclusion, Paragraph 115)
32. While the Government has completed its consultation on new exemptions to BNG, additional exemptions must not undermine the effectiveness of the policy, ecosystem integrity, or the establishment of the BNG credit market. Entire exemptions from BNG for small sites would undermine the policy. The Government should not exempt all small sites, but consider minor alterations, to ensure that the effectiveness of the policy is maintained. We reiterate our recommendation in paragraph 124 of our report on The Role of Natural Capital in the UK's Green Economy. The Government should wait at least three years before making any substantial changes to BNG, as this could be viewed as a watering down of ambition. (Recommendation, Paragraph 116)
33. In the event that BNG requirements do render brownfield sites less attractive or viable then the Enhanced Regeneration Programme could be an appropriate approach, particularly in areas that require housing growth but have struggled to secure investment, related to viability concerns. (Recommendation, Paragraph 117)
34. The Government should conduct an assessment of the capacity and performance of monitoring of BNG commitments by local authorities. Local authorities must understand their responsibilities to ensure that BNG promised is delivered and buy in expertise and resource if it is not currently employed. LPAs should be held to account for adequate monitoring of BNG and resourced to deliver it. (Recommendation, Paragraph 118)

- 35. We recognise and welcome the recognition of the importance of green infrastructure in the latest revision of the NPPF. However, we heard that more can be done to promote it within the planning system. (Conclusion, Paragraph 126)
- 36. The Government should be more prescriptive on the standards of green and blue infrastructure in new developments. The Government should mandate initiatives like Natural England's Green Infrastructure Framework in new and refurbished developments to seek to ensure high standards of green and blue infrastructure are applied consistently across local planning authorities. (Recommendation, Paragraph 127)
- 37. As recommended in our Flooding Resilience report, nature-based solutions are highly effective and underutilised in protecting England's properties from flooding. The Government should embed nature-based solutions as a core component of national flood resilience strategy by 2027 and make Sustainable Drainage Systems mandatory in all new developments. (Recommendation, Paragraph 128)

Sustainable Construction

- 38. Reducing embodied carbon is vital to decreasing the carbon emissions of the built environment and meeting the UK's legally binding climate targets. Considering that key milestones for reducing carbon emissions are rapidly approaching, the Government must accelerate the introduction of policy in this area. (Conclusion, Paragraph 140)
- 39. We reiterate and support the recommendation given by our predecessor Committee on embodied carbon and whole-life carbon assessments:
 - a. "The RICS Professional Statement on whole-life carbon assessments is fit for use and already familiar to UK industry. We recommend that, as soon as possible [...], the Government should seek to establish the RICS methodology as the UK industry standard for whole-life carbon assessments". (Recommendation, Paragraph 141)
- 40. Additionally:
 - a. "We recommend that following the introduction of whole life carbon assessments, the Government should develop progressively ratcheted carbon targets for the built environment, to match the pathway to net zero set out in periodic carbon budgets. These ratcheting targets should be reported on annually, and progress reports towards achieving these targets should be published annually as part of the Net Zero Strategy indicators".

- b.** “We recommend that a clear timeframe for the introduction of mandatory whole-life carbon assessments and ratcheting targets should be set by Government by the end of this year”. (Recommendation, Paragraph 142)
- 41.** The Government should consider what other steps it could take to encourage low-carbon approaches to building, including reviewing taxation policies to incentivise home owners, housebuilders, landlords and tenants to favour homes with lower levels of embodied carbon. (Recommendation, Paragraph 143)
- 42.** We recommend that the Government commission a review into Council Tax, Stamp Duty Land Tax and any other tax policies to consider the merit of offering lower bands of taxation for homes with lower levels of embodied carbon. (Recommendation, Paragraph 144)
- 43.** We would encourage any amendments made to the RICS whole life carbon assessment framework to be accompanied with a formal statement, detailing the amendments and confirming that they have been approved to become part of the UK industry standard. This will ensure clarity for stakeholders and reinforce the updates made using the best available information and research. (Recommendation, Paragraph 145)
- 44.** Major developers should submit whole life carbon assessments as part of planning applications to local authorities; this should be mandatory for all major developments, as defined in the NPPF. The Government should consult on ways to financially incentivise housing development to lower full lifecycle carbon, such as introducing a levy on new build properties containing higher levels of lifecycle carbon alongside reduced taxation on lower carbon homes. (Recommendation, Paragraph 146)
- 45.** The revised NPPF does not contain explicit reference to embodied carbon, despite a widely held opinion that the NPPF must play a central role in supporting low-carbon housing. This oversight limits the NPPF’s ability to minimise carbon emissions from new buildings and undermines efforts to meet the UK’s emission reduction targets. (Conclusion, Paragraph 152)
- 46.** The December 2024 revision of the NPPF should be updated to include clearer and stronger expectations on embodied carbon for new developments. The current Government should also honour the promise made by the previous Government and conduct a consultation on how embodied carbon should be measured and reduced in UK buildings, potentially through Building Regulations, without compromising levels of operational carbon; this consultation should commence no later than March 2026. (Recommendation, Paragraph 153)

- 47.** Alternative building materials, such as timber and hemp, offer practical and effective ways to reduce the embodied carbon of buildings. Their use supports Government ambitions to reach net zero and continue to deliver on their sustainable housing target, in addition to stimulating economic growth through the development of relatively nascent industries. (Conclusion, Paragraph 158)
- 48.** Whilst the Government has taken initial steps to promote timber through the Timber Construction Roadmap, there remains a lack of clear incentives and guidance to encourage the adoption of low-carbon material in housebuilding. The Committee believes the Government should take a more active role in shaping how low carbon materials are popularised. This could be done by providing market signals that reward sustainability. One such measure could be the introduction of eco-labelling for building products, enabling builders and developers to identify materials with lower embodied carbon. (Recommendation, Paragraph 159)
- 49.** The Government could also consider other financial incentives in product areas where the cost differential makes adoption of lower embodied carbon products unattractive and support for manufacturing set up of lower embodied carbon products. We recommend that the Government consult, by April 2026, on what further incentives could shift the dial in this area. (Recommendation, Paragraph 160)
- 50.** Retrofitting existing buildings is more environmentally friendly and sustainable than demolition and new construction. We accept that not all existing properties can be converted into residential buildings, and do not deny that some new homes do need to be built. However, prioritising the retrofit and regeneration of existing buildings could contribute substantial numbers towards the Government's 1.5 million house building target, with minimal harm to nature and with minimal carbon emissions. (Conclusion, Paragraph 166)
- 51.** Although retrofit and regeneration of buildings is already encouraged in policy, it is often sidelined. Strengthening focus in this area should be prioritised, considering the range of benefits associated with doing so. (Conclusion, Paragraph 167)
- 52.** Government should prioritise and incentivise retrofitting over demolition by strengthening requirements to reuse, repurpose and refurbish buildings before any demolition. It is contrary to the Government's environmental objectives to incentivise carbon-intensive new building over the re-use of existing sites. To encourage the retrofit and repurposing of existing buildings, the VAT on retrofit projects should be reduced from 20% to reflect environmental benefits and support uptake. Government should therefore confirm that a property brought back into use would count towards its, and a local authority's housing target. (Recommendation, Paragraph 168)

- 53.** As with the embodied and operational carbon recommendation (Para 138nb mbnj) we believe that the Government should investigate how it can use the tax system to reduce the tax burden on properties that reduce their carbon footprint and/or increase the tax burden on environmentally regressive properties to create a greater incentive for making retrofitting decisions that reduce the carbon footprint of a home, as part of the review we recommended. (Conclusion, Paragraph 169)

Skills and Resourcing

- 54.** One of the strongest messages we have heard throughout this inquiry is that local planning authorities are severely under-resourced in terms of ecological expertise. Addressing this should be a priority, as without rapid and meaningful support, the Government will struggle to meet its house building targets while adhering to environmental standards. The Government must ensure that local planning authorities are adequately resourced in order to hire and train ecologists to execute the range of recently introduced and proposed environmental planning policies, such as Biodiversity Net Gain. (Conclusion, Paragraph 187)
- 55.** We recommend that the Government should invest in and prioritise the training and upskilling of talent in ecology as a priority. As a temporary measure, to address current staff shortages, the Government should pilot and establish local ecological resource hubs, consisting of qualified ecologists and environmental planners, who are available to local authorities facing acute resource challenges. The Government should establish a pilot programme for ecological resource hubs by July 2026. (Recommendation, Paragraph 188)
- 56.** Qualifications in ecology may not always contain sufficient practical elements in the courses that equip future ecologists with the necessary skills for professional practice. The Committee has heard that some students may require additional training to develop the necessary competencies needed for professional roles after gaining formal qualifications such as degrees; this can add to planning delays and capacity issues in the sector. (Conclusion, Paragraph 189)
- 57.** We recommend that the Government, via Skills England, begins working with ecology qualification providers to standardise and embed essential practical components into ecology course design, by April 2026. This is to ensure that courses are geared towards modern policy demands and individuals are sufficiently equipped with the necessary skills for their professional practice. This should include training on the planning system for ecologists. (Recommendation, Paragraph 190)

- 58.** The Government should partner with professional bodies to accelerate the training of early-career ecologists through a national level, government-supported pathway, similar to that of the Pathways to Planning programme backed by the Local Government Association and MHCLG. The first iteration of this programme should be introduced by September 2027, at the very latest. (Recommendation, Paragraph 191)
- 59.** The shortage of planning professionals in local authorities is undermining the planning system's ability to function effectively. Planning officers are unable to thoroughly consider applications within statutory timeframes and are unable to adequately pre-consult. This capacity gap compromises the quality, transparency and timeliness of planning decisions. This is problematic, as Natural England has gaps in its own expertise and relies on knowledge from local authorities. (Conclusion, Paragraph 202)
- 60.** Planning qualifications do not adequately equip professionals with sufficient levels of carbon literacy or ecological knowledge. This undermines planning officers' ability to fully consider environmental factors in their decision making. To ensure that climate resilience, carbon emissions and ecology are fully incorporated into planning decisions, training on climate change and ecology must be incorporated as core components in planning qualifications and training courses. (Conclusion, Paragraph 203)
- 61.** Planning qualifications and accreditation should include mandatory training in ecology and carbon literacy, to ensure that planning professionals have adequate knowledge of nature and climate issues to address these challenges in the built environment. We recommend that the Government, via Skills England, works with a relevant body, such as the Royal Town Planning Institute to:
- a.** Develop mandatory training in ecology and the decarbonisation of buildings for those working towards Chartered Town Planner status.
 - b.** Review current planning qualifications to ensure they adequately test knowledge of ecology and carbon literacy. (Recommendation, Paragraph 204)
- 62.** In addition, we recommend that the Government works with the Planning Advisory Service to develop suitable continuous professional development modules in ecology, carbon literacy and climate change, for qualified planning professionals and support their delivery through local authorities. These should be in place by September 2026. (Recommendation, Paragraph 206)

63. We have heard concerns that the construction industry does not have the numbers, nor the skills, needed to deliver the volume or types of homes that will enable the Government to meet its targets for housing, the environment, nature and net zero. We welcome the Government's acknowledgment of this, along with its investments and policies to expand the construction workforce by 100,000 and equip it with the skills needed to deliver on its ambitious plans. (Conclusion, Paragraph 216)
64. However, we are yet to be convinced that this alone will be enough. As the Government itself has acknowledged, the construction sector will be instrumental in meeting wider Government commitments. Recruiting new talent is essential but training takes time and, in the interim, the existing workforce is already overstretched but expected to increase output. We are concerned as to whether the Government has adequately demonstrated that the existing and future construction workforce will have the full range of skills needed to meet housing and environment targets. These skills include the ability to work with new materials, install a range of technologies, maximise the productivity of brownfield sites, use the latest digital tools, and have the knowledge and skills to interact with planning professionals and ecologists. (Conclusion, Paragraph 217)
65. We recommend that the Government, in response to this report, should:
- Provide a realistic assessment of the construction workforce and what is needed to deliver the Government's housing targets for each remaining year of this Parliament. This should include:
 - Annual estimates of the number of construction workers needed to meet the Government's yearly and five-year home building targets.
 - The projected natural wastage (i.e. rates of retirement) for each year from the existing workforce, to establish a baseline for recruitment and anticipate the impacts on home building.
 - Projections as to how many new recruits are expected to join the construction workforce, after adequate training that focusses on building residential properties.
 - Possible contingencies, for each year, if existing and projected workforce levels are insufficient to deliver annual housing targets.
 - Set out an analysis of the skill set the Government believes will be required to deliver 1.5 million homes, in line with climate and biodiversity targets. This should include an analysis of any significant gaps and how they will be addressed, in addition to:

- Skills required to install sustainable building materials.
- Digital skills and tools to improve efficiency and support the measurement and reduction of embodied and operational carbon.
- Skills and knowledge to maximise the development of brownfield sites for housing.
- Skills needed to retrofit existing housing stock, to meet environmental and net zero standards.
- An ability to work with ecologists and planning professionals to ensure optimum environmental and nature-based outcomes and support key policies such as Biodiversity Net Gain.
(Recommendation, Paragraph 218)

66. If the environmental objectives of the Government are to be achieved, it is vital that Natural England (NE) is adequately resourced. However, NE does not currently have the necessary resources to deliver the Government's expectations of it. Its reliance on partners, such as local authorities, is concerning considering they are also subject to severe under-resourcing.
(Conclusion, Paragraph 226)

67. The Government should publish a paper, by March 2026, clearly laying out the Government's housing targets, NE's role as a statutory consultee and in developing and implementing the NRF, and what resourcing will be required for NE going forwards to deliver this. This paper should include details as to how NE will operate in light of staffing cuts and the additional responsibilities that it will be given when the current Planning and Infrastructure Bill is enacted. (Recommendation, Paragraph 227)

Formal minutes

Tuesday 11 November 2025

Members present

Mr Toby Perkins, in the Chair

Olivia Blake

Barry Gardiner

Sarah Gibson

Martin Rhodes

Alison Taylor

John Whitby

[...]

The Committee deliberated.

Environmental sustainability and housing growth

Draft Report (*Environmental sustainability and housing growth*), proposed by the Chair, brought up and read.

Paragraphs 1 to 227 read and agreed to.

Summary agreed to

Annexes agreed to.

Resolved, That the Report be the Sixth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[...]

Adjournment

Adjourned till Wednesday 12 November 2025 at 2.00 pm.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Wednesday 15 January 2025

Alistair Smyth, Director of Policy and Research, National Housing Federation; **Charles Trew**, Head of Policy, Shelter; **Ed Lockhart**, Chief Executive, Future Homes Hub [Q1-34](#)

Erika Lewis, Chief Executive Officer, Connected Places Catapult; **Professor Rokia Raslan**, Professor of Built Environment Decarbonisation, University College London; **Becky Pullinger**, Head of Land Use Planning, The Wildlife Trusts [Q34-65](#)

Wednesday 5 February 2025

Sarah Postlethwaite, Planning Ecologist, North Northamptonshire Council; **Dr John Martin**, Associate Professor, School of Geography, Earth and Environmental Sciences, University of Plymouth; **Dr Iain Boulton**, Vice Chair, Association of Local Government Ecologists (ALGE) [Q66-126](#)

Dr Victoria Hills, Chief Executive, Royal Town Planning Institute; **Ben Kite**, Chair, Strategic Policy Panel, Chartered Institute of Ecology and Environmental Management; **Charlotte Neal**, Director of Surveying Practice, Royal Institution of Chartered Surveyors [Q127-184](#)

Wednesday 7 May 2025

Ben Murphy, Estate Director, The Duchy of Cornwall [Q185-203](#)

Ashley Spearing, Managing Director of Development and Regeneration, Berkeley Group; **Kenny Duncan**, Managing Director of Strategic Land, Crest Nicholson; **Chris Thompson**, Founder, Citu [Q204-253](#)

Wednesday 4 June 2025

Emma Toovey, Chief Land and Nature Officer, Environment Bank; **David King**, Managing Director, Meadfleet; **Niall McGann**, CEO, Fexco [Q254-208](#)

Dr Rufus Howard, Impact Assessment Policy Lead, Institute of Environmental Management and Assessment; **Brian Berry**, CEO, Federation of Master Builders; **Sue Searle**, Managing Director and Principal Ecologist, Ecology Training UK [Q299-348](#)

Monday 30 June 2025

Philip Duffy, Chief Executive, Environment Agency; **Marian Spain**, Chief Executive, Natural England; **Eamonn Boylan**, Chief Executive, Homes England [Q349-396](#)

Monday 21 July 2025

Mary Creagh MP, Parliamentary Under-Secretary of State (Minister for Nature), Department for Environment, Food and Rural Affairs; **Nick Barter**, Deputy Director for Land Use, Department for Environment, Food and Rural Affairs; **Matthew Pennycook MP**, Minister of State (Minister for Housing and Planning), Ministry of Housing, Communities and Local Government; **William Burgon**, Director for Planning, Ministry of Housing, Communities and Local Government [Q397-460](#)

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

ESH numbers are generated by the evidence processing system and so may not be complete.

| | | |
|----|--|-------------------------|
| 1 | AWGroup | ESH0047 |
| 2 | Arbtech | ESH0094 |
| 3 | Architects' Climate Action Network | ESH0100 |
| 4 | Association for Consultancy and Engineering (ACE); and Environmental Industries Commission (EIC) | ESH0012 |
| 5 | Balchin, Mr Nigel | ESH0016 |
| 6 | Better Planning Coalition | ESH0103 |
| 7 | Bioabundance Community Interest Company | ESH0007 |
| 8 | Brannen, Paul (Former MEP and author of 'Timber! How wood can help save the world from climate breakdown', European Parliament) | ESH0002 |
| 9 | British Ecological Society | ESH0050 |
| 10 | Campaign to Protect Rural England (CPRE) | ESH0023 |
| 11 | Campaign for National Parks | ESH0013 |
| 12 | Catchment Based Approach Urban Water Group | ESH0040 |
| 13 | Champion, Sarah Labour MP for Rotherham, Parliament); and Mike Farrell (Chair of the National Allotment Society, National Allotment Society) | ESH0024 |
| 14 | Chartered Association of Building Engineers | ESH0045 |
| 15 | Chartered Institute of Architectural Technologists | ESH0027 |
| 16 | Chartered Institute of Housing | ESH0037 |
| 17 | Churn Churces Climate Action Group | ESH0035 |
| 18 | Climate Emergency UK | ESH0011 |
| 19 | CoMoUK Trust | ESH0078 |
| 20 | Colne Valley Regional Park | ESH0062 |

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| 21 | Community Planning Alliance | ESH0005 |
| 22 | Compassion in World Farming | ESH0072 |
| 23 | Confederation of Timber Industries; and Timber Development UK | ESH0059 |
| 24 | Cornwall Council | ESH0099 |
| 25 | Council for British Archaeology (CBA); and Chartered Institute for Archaeologists (CIfA) | ESH0018 |
| 26 | Country Land and Business Association (CLA) | ESH0074 |
| 27 | Crawford, Baron John | ESH0003 |
| 28 | Crooks, Conor | ESH0038 |
| 29 | Dark Matter Labs; Ove Arup and Partners; and University College London | ESH0076 |
| 30 | EARTHA - East Anglian Regional Telluric Houses Association | ESH0053 |
| 31 | Earth Building UK and Ireland | ESH0017 |
| 32 | Environment Bank | ESH0096 |
| 33 | Environmental Building Research Group, University of Plymouth | ESH0067 |
| 34 | Essex Planning Officers Association | ESH0032 |
| 35 | Forbes, Mr Alexander | ESH0080 |
| 36 | Friends of the Earth England, Wales and Northern Ireland | ESH0066 |
| 37 | Future Homes Hub | ESH0091 |
| 38 | Gieseckam, Dr Jannik (Chancellor's Fellow, University of Strathclyde); Prof Alice Moncaster (Professor of Sustainable Construction, University of the West of England); Profesor Francesco Pomponi (Chair of Sustainability & Environment, York School of Architecture); Professor Aoife Houlihan Wiberg (Professor, University of Bath); Justin Bean (PhD candidate, University of Bath); and Dr Stephen Allen (Associate Professor, University of Bath) | ESH0068 |
| 39 | Gillott, Dr Charles (Research Associate, The University of Sheffield); Dr Danielle Densley Tingley (Professor, The University of Sheffield); Dr Hadi Arbabi (Lecturer, The University of Sheffield); Danielle Abbey (PhD Student, The University of Sheffield); Miriam Graham (Research Assistant, The University of Sheffield); and Dr Stephen Hincks (Professor, The University of Sheffield) | ESH0029 |

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| 40 | Graham, Dr Philip (Postdoctoral researcher and architect, University of Cambridge); Dr Anna Pagani (Senior lecturer in Engineering, Kings College, London); and Dr Michal Drewniok (Lecturer in Civil Engineering, University of Leeds) | ESH0083 |
| 41 | Green Alliance | ESH0093 |
| 42 | Green Alliance | ESH0031 |
| 43 | Hampshire & Isle of Wight Wildlife Trust | ESH0071 |
| 44 | Healthy Air Coalition | ESH0041 |
| 45 | Historic England | ESH0051 |
| 46 | Historic Houses | ESH0008 |
| 47 | Home Builders Federation | ESH0025 |
| 48 | Homes England | ESH0104 |
| 49 | Horticultural Trades Association | ESH0042 |
| 50 | Human Nature Places | ESH0049 |
| 51 | Institute of Environmental Management and Assessment | ESH0019 |
| 52 | Joe's Blooms | ESH0092 |
| 53 | Keepmoat Homes | ESH0014 |
| 54 | Kirby, Dr Matthew (Research Associate , University of Dundee) | ESH0043 |
| 55 | Landworkers' Alliance | ESH0065 |
| 56 | Local Government Association | ESH0101 |
| 57 | Graham, Miriam CEng MICE | ESH0048 |
| 58 | Manchester Social Housing Commission | ESH0055 |
| 59 | Martin, Dr John (Associate Professor, School of Geography, Earth and Environmental Sciences, University of Plymouth) | ESH0089 |
| 60 | Mineral Products Association | ESH0063 |
| 61 | Ministry of Housing, Communities and Local Government | ESH0085 |
| 62 | National Trust | ESH0028 |
| 63 | Natural England | ESH0058 |
| 64 | NatureSpace | ESH0088 |
| 65 | Ove Arup and Partners | ESH0052 |
| 66 | Pannifex, Sally (Liver Disease Clinical Nurse Specialist, NHS) | ESH0044 |
| 67 | Part Z | ESH0075 |
| 68 | Pennon Group PLC | ESH0030 |
| 69 | Plantlife | ESH0070 |

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| 70 | Policy Impact Unit and Net Zero What Works Centre at University College London | ESH0082 |
| 71 | Postlethwaite, Sarah (Planning Ecologist, North Northamptonshire Council) | ESH0087 |
| 72 | Refurbish Don't Demolish | ESH0056 |
| 73 | Renukappa, Dr Suresh (Reader in Sustainable Value Creation , University of Wolverhampton); Mr Mark Stride (Research Scholar , University of Wolverhampton); and Professor Subashini Suresh (Professor of Knowledge Management , University of Wolverhampton) | ESH0020 |
| 74 | Rights Community Action | ESH0054 |
| 75 | Royal Institution of Chartered Surveyors | ESH0090 |
| 76 | Scharf, Daniel (Planning Consultant, Pft Planning) | ESH0006 |
| 77 | Schueller, Miss Georgina (Freelance teacher) | ESH0084 |
| 78 | Searle, Sue (Principal Ecologist and Senior Tutor, Ecology Training UK) | ESH0095 |
| 79 | Skidmore, Diane | ESH0057 |
| 80 | Smart Growth UK | ESH0022 |
| 81 | Stayton, Margaret | ESH0004 |
| 82 | Sustain | ESH0079 |
| 83 | Swaffield, Laura | ESH0036 |
| 84 | Tait, Professor Malcolm (Professor of Planning, University of Sheffield); and Dr Kiera Chapman (Postdoctoral researcher in attention, flourishing and the humanities, University of Oxford) | ESH0010 |
| 85 | Thakeham | ESH0015 |
| 86 | The Duchy of Cornwall | ESH0098 |
| 87 | The Edge | ESH0077 |
| 88 | The Land Trust | ESH0026 |
| 89 | The Office for Environmental Protection | ESH0069 |
| 90 | The Rivers Trust | ESH0033 |
| 91 | The Royal Institute of British Architects | ESH0060 |
| 92 | The UK Green Building Council | ESH0064 |
| 93 | The Wildlife Trusts | ESH0086 |
| 94 | The Wildlife Trusts | ESH0021 |

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| 95 | The Woodland Trust | <u>ESH0039</u> |
| 96 | Town & Country Planning Association | <u>ESH0061</u> |
| 97 | UK100 | <u>ESH0046</u> |
| 98 | Wellborne-Hartley, Professor | <u>ESH0001</u> |
| 99 | Wildlife and Countryside Link | <u>ESH0081</u> |

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the [publications page](#) of the Committee's website.

Session 2024–26

| Number | Title | Reference |
|-------------|--|-----------|
| 5th | Airport expansion and climate and nature targets | HC 831 |
| 4th | Flood resilience in England | HC 550 |
| 3rd | The UK and the Antarctic environment | HC 499 |
| 2nd | Governing the marine environment | HC 551 |
| 1st | The role of natural capital in the UK's green economy | HC 501 |
| 5th Special | The UK and the Antarctic environment: Government Response | HC 1273 |
| 4th Special | Governing the marine environment: Government Response | HC 1272 |
| 3rd Special | The role of natural capital in the green economy: Government Response | HC 1242 |
| 2nd Special | Net zero and UK shipping: Government Response | HC 705 |
| 1st Special | Enabling sustainable electrification of the economy: Government Response | HC 564 |